

01-903-CD  
CURWENSVILLE GOSPEL TABERNACLE OF -vs- BONNIE C. LASH etal  
THE CHRISTIAN AND MISSIONARY  
ALLIANCE

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL :  
TABERNACLE of the CHRISTIAN :  
and MISSIONARY ALLIANCE :

Plaintiff

-vs-

BONNIE C. LASH, a/k/a BONNIE : Filed on behalf of: Plaintiff  
C. LUZIER, MARY KAVALA, :  
WALTER ANDREW KROLICK and : Counsel of Record for this Party:  
AGNES KROLICK, their heirs, : Laurance B. Seaman, Esq.  
personal representatives and:  
assigns, and any other : Supreme Court Record No.:  
parties claiming any right, : 19620  
title or interest in the :  
premises described herein, : GATES & SEAMAN

Defendants

: Attorneys At Law  
: 2 N. Front St.  
: P.O. Box 846  
: Clearfield, PA 16830  
:  
:  
:

FILED

JUN 12 2001

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL TABERNACLE :  
of the CHRISTIAN and MISSIONARY :  
ALLIANCE :

Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

NOTICE TO DEFEND

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 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.

COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL TABERNACLE :  
of the CHRISTIAN and MISSIONARY :  
ALLIANCE :  
Plaintiff :  
vs. :  
BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :  
Defendants :

COMPLAINT

NOW COMES, Plaintiff, The Curwensville Gospel Tabernacle of the Christian and Missionary Alliance, by its attorneys, Gates & Seaman, and sets forth the following cause of action:

1. Plaintiff, The Curwensville Gospel Tabernacle of the Christian and Missionary Alliance, is a non profit organization, with a mailing address of 803 Susquehanna Avenue, Curwensville, Pennsylvania, 16833.

2. That Defendant, Bonnie C. Lash, a/k/a Bonnie C. Luzier, is an individual residing at 600 Hill Street, Curwensville, Pennsylvania, 16833.

3. That Defendant, Mary Kavala, is an individual residing at 620 Susquehanna Avenue, Curwensville, Pennsylvania, 16833.

4. That Defendants, Walter Andrew Krolick and Agnes Krolick, husband and wife, are individuals residing at 434 Chestnut Avenue, Curwensville, Pennsylvania, 16833.

5. That Plaintiff, The Curwensville Gospel Tabernacle of the Christian and Missionary Alliance, by virtue of a deed from Joe E. Sopic and Virginia T. Sopic, dated December 23, 1997 and recorded in Clearfield County Deeds and Records Book 1897, Page 70 and by virtue of a deed from Steven R. Moore and Lisa G. Moore, dated August 13, 1998 and recorded in Clearfield County Deeds and Records Book 1960, Page 68, became seized of and Plaintiff is now and has been since said dates the lawful owner and in possession of Lot Nos. 124, 125 and 126 in an unrecorded Plan of the Addition to Curwensville Borough on land of E.A. Irvin Estate, dated August, 1922, (hereafter "The Plan", said lots being situate in Curwensville Borough, Clearfield County, Pennsylvania.

6. That included in The Plan and running between Lot Nos. 125 and 126 is an unopened portion of Linden Street, approximately twenty (20) feet in width and extending approximately two hundred (200) feet, more or less, from the line of Susquehanna Avenue to the line of land now or formerly of Joseph S. Ammerman, (hereafter "The Premises", and Plaintiff has been in possession of the Premises since acquisition of the lots as set forth in Paragraph 5 above.

7. That said Defendants, as well as other owners of lots in the Plan, may have acquired a private easement over the Premises.

8. That Quit Claim Deeds have been executed, acknowledged and delivered to Plaintiff by all owners, except Defendants, of lots in the Plan releasing any rights they may have acquired in and to said private easement over the Premises.

9. That Plaintiff, and its predecessors in title has been in actual, continuous, exclusive, visible, notorious, distinct and hostile possession of the Premises for more than twenty-one (21) years, thereby extinguishing Defendants' rights to the Premises.

10. That a Quiet Title Action is necessary in order to clarify Plaintiff's title to the Premises.

WHEREFORE, Plaintiff requests that the Court:

a. Determine that Plaintiff is seized of an indefeasible title to the Premises, as described in Paragraph 6 above;

b. Order Defendants, their personal representatives, heirs, successors and assigns and other parties having any claim to the Premises, to bring an action of ejectment to establish their claim to the Premises within a time set by the Court, or forever be barred from asserting any right, title or interest in the Premises; and

c. Enter such judgment as may be necessary in the establishing in Plaintiff an indefeasible title to the Premises.

GATES & SEAMAN

BY: 

Attorneys for Plaintiffs

**VERIFICATION**

The undersigned verifies that he is the Vice Chairman of the Governing Board of The Curwensville Gospel Tabernacle of the Christian and Missionary Alliance, the Plaintiff in the within action, and that the statements made in the foregoing document are true and correct to the best of his knowledge, information and belief. The undersigned understands that false statements made herein are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

  
James W. Mitchell

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNA.  
CIVIL ACTION - LAW  
NO.

THE CURWENSVILLE GOSPEL  
TABERNACLE of the CHRISTIAN  
and MISSIONARY ALLIANCE

Plaintiff

vs.

BONNIE C. LASH, a/k/a BONNIE  
C. LUZIER, MARY KAVALA,  
WALTER ANDREW KROLICK and  
AGNES KROLICK, their heirs,  
personal representatives and

assigns, and any other parties  
claiming any right, title or  
interest in the premises  
described herein,

Defendants

COMPLAINT IN ACTION  
TO QUIET TITLE

*4 CC Acty*  
*01/11/83*  
*Atty gen*  
*90.00*

LAW OFFICES  
GATES & SEAMAN  
2 NORTH FRONT STREET  
P.O. BOX 846  
CLEARFIELD, PA. 16830



**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 11089

THE CURWENSVILLE GOSPEL TABERNACLE

01-903-CD

VS.

LASH, BONNIE C. AI

COMPLAINT

**SHERIFF RETURNS**

---

NOW JUNE 18, 2001 AT 2:16 PM DST SERVED THE WITHIN COMPLAINT ON  
AGNES KROLICK, DEFENDANT AT RESIDENCE, 434 CHESTNUT AVE., CURWENSVILLE  
CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO AGNES KROLICK A TRUE  
AND ATTESTED COPY OF THE ORIGINAL COMPLAINT AND MADE KNOWN TO  
HER THE CONTENTS THEREOF.  
SERVED BY: DAVIS/MORGILLO

NOW JUNE 18, 2001 AT 2:16 PM DST SERVED THE WITHIN COMPLAINT ON  
WALTER ANDREW KROLICK, DEFENDANT AT RESIDENCE, 434 CHESTNUT AVE.,  
CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO AGNES  
KROLICK, WIFE, A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT  
AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: DAVIS/MORGILLO

NOW JUNE 18, 2001 AT 2:34 PM DST SERVED THE WITHIN COMPLAINT ON  
MARY KAVALA, DEFENDANT AT RESIDENCE, 620 SUSQUEHANNA AVE.,  
CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO  
MARY KAVALA A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT  
AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: DAVIS/MORGILLO

NOW JUNE 29, 2001 AT 2:02 PM DST SERVED THE WITHIN COMPLAINT ON  
BONNIE C. LASH A/K/A BONNIE C. LUZIER, DEFENDANT AT RESIDENCE,  
600 HILL STREET, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA  
BY HANDING TO BONNIE C. LUZIER A TRUE AND ATTESTED COPY OF THE  
ORIGINAL COMPLAINT AND MADE KNOWN TO HER THE CONTENTS THEREOF.  
SERVED BY: MORGILLO

**In The Court of Common Pleas of Clearfield County, Pennsylvania**

Sheriff Docket # 11089

THE CURWENSVILLE GOSPEL TABERNACLE

01-903-CD

VS.

LASH, BONNIE C. AI

COMPLAINT

**SHERIFF RETURNS**

Return Costs

Cost	Description
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45.70	SHFF. HAWKINS PAID BY: ATTY.
-------	------------------------------

40.00	SURCHARGE PAID BY: ATTY.
-------	--------------------------

Sworn to Before Me This

5th Day Of July 2001  
*William A. Shaw*

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

So Answers,

*Chester A. Hawkins*  
*by Marilyn Hamr*  
Chester A. Hawkins  
Sheriff

**FILED**

JUL 05 2001  
01:28 / noc  
William A. Shaw  
Prothonotary  
*CS*  
*127*

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL :  
TABERNACLE of the CHRISTIAN :  
and MISSIONARY ALLIANCE :

Plaintiff

-vs-

BONNIE C. LASH, a/k/a BONNIE :  
C. LUZIER, MARY KAVALA, :  
WALTER ANDREW KROLICK and :  
AGNES KROLICK, their heirs, :  
personal representatives and :  
assigns, and any other :  
parties claiming any right, :  
title or interest in the :  
premises described herein, :

Defendants

: No. 2001-00903-CD  
: Type of Case: Civil  
:  
: Type of Pleading:  
: AFFIDAVIT OF SERVICE  
:  
: Filed on behalf of: Plaintiff  
:  
: Counsel of Record for this Party:  
: Laurance B. Seaman, Esq.  
:  
: Supreme Court Record No.:  
: 19620  
:  
: GATES & SEAMAN  
: Attorneys At Law  
: 2 N. Front St.  
: P.O. Box 846  
: Clearfield, PA 16830  
:  
:  
:

FILED

AUG 01 2001

Shaw  
Clerk

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE :  
Plaintiff :

vs. :

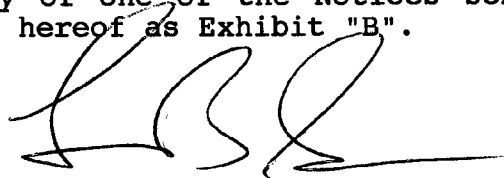
:No. 2001-00903-CD

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

AFFIDAVIT OF SERVICE

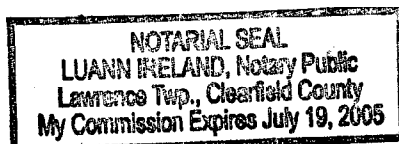
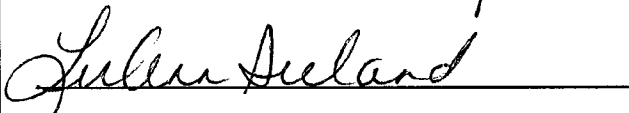
LAURANCE B. SEAMAN, ESQUIRE, of Gates & Seaman, being  
duly sworn according to law, states that he mailed to Defendants,  
BONNIE C. LASH, a/k/a BONNIE C. LUZIER, MARY KAVALA, WALTER ANDREW  
KROLICK and AGNES KROLICK, Notice of Intent to Take Default  
Judgment (as required by Pa. R.C.P. §237.1) in the above-captioned  
matter on July 20, 2001, by United States mail, postage prepaid,  
as evidenced by the Certificates of Mailing which are attached  
hereto as Exhibit "A". A copy of one of the Notices sent is  
attached hereto and made a part hereof as Exhibit "B".

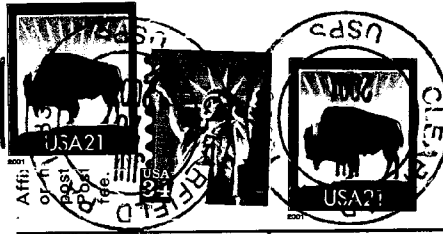


Laurance B. Seaman, Esquire  
GATES & SEAMAN

Sworn to and subscribed before

me this 1<sup>st</sup> day of August, 2001.





U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:  <b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830	
One piece of ordinary mail addressed to: <b>Agnes Krolick</b> 434 Chestnut Avenue Curwensville, Pennsylvania 16833	

PS Form 3817, Mar. 1989

U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:  <b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830	
One piece of ordinary mail addressed to: <b>Bonnie C. Lash, a/k/a</b> <b>Bonnie C. Luzier</b> 600 Hill Street Curwensville, Pennsylvania 16833	

PS Form 3817, Mar. 1989

Affix fee here in stamps  
or meter postage and  
post mark. Inquire of  
Postmaster for current  
fee.



U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:  <b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830	
One piece of ordinary mail addressed to: <b>Walter Andrew Krolick</b> 434 Chestnut Avenue Curwensville, Pennsylvania 16833	

PS Form 3817, Mar. 1989

U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:  <b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830	
One piece of ordinary mail addressed to: <b>Mary Kavala</b> 620 Susquehanna Avenue Curwensville, Pennsylvania 16833	

PS Form 3817, Mar. 1989

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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :  
Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Bonnie C. Lash, a/k/a Bonnie C. Luzier  
600 Hill Street  
Curwensville, Pennsylvania 16833


DATE: July 20, 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 (10) 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 FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK, COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

GATES & SEAMAN  
By:

  
Laurance B. Seaman, Esquire

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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Mary Kavala  
620 Susquehanna Avenue  
Curwensville, Pennsylvania 16833

DATE: July 20, 2001

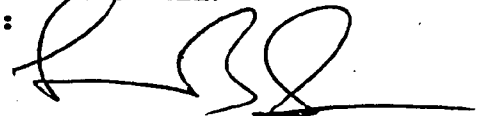
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Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

GATES & SEAMAN

By:



Laurance B. Seaman, Esquire

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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Walter Andrew Krolick  
434 Chestnut Avenue  
Curwensville, Pennsylvania 16833

DATE: July 20, 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 (10) 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 FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK, COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

GATES & SEAMAN

By:



Laurance B. Seaman, Esquire



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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Agnes Krolick  
434 Chestnut Avenue  
Curwensville, Pennsylvania 16833


DATE: July 20, 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 (10) 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 FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK, COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

GATES & SEAMAN  
By:

  
Laurance B. Seaman, Esquire

FILED

AUG 01 2001

03.30/1000 29

William A. Shaw

Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL :  
TABERNACLE of the CHRISTIAN :  
and MISSIONARY ALLIANCE :

Plaintiff

-vs-

BONNIE C. LASH, a/k/a BONNIE :  
C. LUZIER, MARY KAVALA, :  
WALTER ANDREW KROLICK and :  
AGNES KROLICK, their heirs, :  
personal representatives and :  
assigns, and any other :  
parties claiming any right, :  
title or interest in the :  
premises described herein, :

Defendants

: No. 2001-00903-CD  
: Type of Case: Civil  
:  
: Type of Pleading:  
: PETITION FOR JUDGMENT  
: and ORDER  
:

: Filed on behalf of: Plaintiff  
:  
: Counsel of Record for this Party:  
: Laurance B. Seaman, Esq.  
:  
: Supreme Court Record No.:  
: 19620  
:  
: GATES & SEAMAN  
: Attorneys At Law  
: 2 N. Front St.  
: P.O. Box 846  
: Clearfield, PA 16830  
:  
:  
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FILED

AUG 01 2001

William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

PETITION FOR JUDGMENT

TO THE HONORABLE JUDGE OF SAID COURT:

The Petition of Gates & Seaman, attorneys for Plaintiff  
in the above captioned matter, respectfully represents:

1. That your Petitioners are the attorneys of record  
for Plaintiff in the above captioned proceedings.

2. That service on Defendants, BONNIE C. LASH, a/k/a  
BONNIE C. LUZIER, MARY KAVALA, WALTER ANDREW KROLICK and AGNES  
KROLICK, was accomplished through the office of the Clearfield  
County Sheriff, which appears of record.

3. That no appearance or pleading has been entered or  
filed and more than twenty (20) days have elapsed since the dates  
of service of the Complaint.

4. All the above named Defendants were served with the  
Notice of Plaintiff's intent to have a default judgment entered as

required by Pa. R.C.P. §237.1 by regular mail on July 20, 2001. No appearance or pleading has been entered or filed to date. An Affidavit of this service has been filed of record.

WHEREFORE, Plaintiff, by its attorneys, Gates & Seaman, moves your Honorable Court to enter judgment in favor of Plaintiff and against Defendants, BONNIE C. LASH, a/k/a BONNIE C. LUZIER, MARY KAVALA, WALTER ANDREW KROLICK and AGNES KROLICK, their heirs, personal representatives and assigns, and any other parties claiming any right, title or interest in the premises described herein in accordance with the prayer of Plaintiff's Complaint and Pa. R.C.P. §1066.

GATES & SEAMAN

A handwritten signature in dark ink, appearing to read 'LBS', is written over the printed name 'GATES & SEAMAN'.

---

Laurance B. Seaman, Esquire  
Attorney for Plaintiffs

COMMONWEALTH OF PENNSYLVANIA

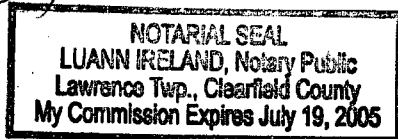
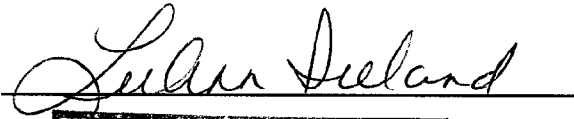
COUNTY OF CLEARFIELD

:  
: SS:  
:

LAURANCE B. SEAMAN, being duly sworn according to law,  
deposes and says that the facts set forth in the foregoing  
Petition for Judgment are true and correct to the best of his  
knowledge, information and belief.



Sworn to and subscribed before me  
this 15<sup>th</sup> day of August, 2001.



IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL TABERNACLE of  
the CHRISTIAN and MISSIONARY ALLIANCE  
Plaintiff

vs.

BONNIE C. LASH, a/k/a BONNIE C.  
LUZIER, MARY KAVALA, WALTER ANDREW  
KROLICK, and AGNES KROLICK, their  
heirs, personal representatives and  
assigns, and any other parties claiming  
any right, title or interest in the  
premises described herein,

Defendants

:  
:  
:  
:  
:No. 2001-00903-CD  
:

FILED

AUG 02 2001

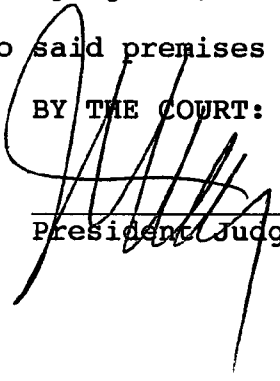
William A. Shaw  
Prothonotary

ORDER

AND NOW, this 2<sup>nd</sup> day of August, 2001, a Petition  
having been considered and the Court being advised that no  
pleadings or appearances have been filed by or on behalf of  
Defendants, BONNIE C. LASH, a/k/a BONNIE C. LUZIER, MARY KAVALA,  
WALTER ANDREW KROLICK and AGNES KROLICK, their heirs,  
representatives or assigns, and any other parties claiming any  
right, title or interest in the premises described in Exhibit "A",  
which is attached hereto and made a part hereof, except Plaintiff,  
and Notice of intent to take default judgment having been properly  
given, IT IS ORDERED AND DECREED that Defendants, BONNIE C. LASH,  
a/k/a BONNIE C. LUZIER, MARY KAVALA, WALTER ANDREW KROLICK and  
AGNES KROLICK, their heirs, personal representatives or assigns,  
or anyone claiming an interest, lien, right or title in the said

premises inconsistent with the interest or claim of Plaintiff as set forth in its Complaint, shall be forever barred, unless, appropriate action is taken by said Defendants, their heirs, personal representatives or assigns, or anyone claiming an adverse interest, lien, right or title inconsistent with the interest, title or claim of Plaintiff, within thirty (30) days from the date of this Order. Upon failure of said Defendants, their heirs, personal representatives or assigns, or anyone claiming an adverse interest, lien right or title in said premises to take appropriate action as provided by this Order, the Prothonotary of Clearfield County is directed to enter final judgment for Plaintiff, THE CURWENSVILLE GOSPEL TABERNACLE of the CHRISTIAN and MISSIONARY ALLIANCE, as to the premises as described in Exhibit "A", upon the expiration of the thirty (30) day period, upon Praecipe by Plaintiff's counsel, and upon final judgment, Plaintiff shall be seized of an indefeasible title to said premises as aforesaid.

BY THE COURT:

  
\_\_\_\_\_  
President Judge



FILED

AUG 02 2001

1341 12 < c atty & notes

William A. Shaw

Prothonotary

*[Signature]*

ALL the Grantor's right, title and interest in and to an unopened portion of Linden Street located between Lots No. 125 and 126 in an unrecorded Plan of Lots known as the Addition to Curwensville Borough on land of E.A. Irvin Estate, dated August, 1922, approximately twenty (20) feet in width and extending approximately two hundred feet, more or less, from the line of Susquehanna Avenue to the line of land now or formerly of Joseph S. Ammerman.

**EXHIBIT "A"**

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNA.  
CIVIL ACTION - LAW

No. 2001-00903-CD

THE CURWENSVILLE GOSPEL  
TABERNACLE OF THE CHRISTIAN  
and MISSIONARY ALLIANCE

A  
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D

BONNIE C. LASH, a/k/a BONNIE  
C. LUZIER, MARY KAVALA,  
WALTER ANDREW KROLICK and  
AGNES KROLICK, their heirs,  
personal representatives and  
assigns,

PETITION FOR JUDGMENT  
and ORDER

FILED

AUG 01 2001

03:30/1706  
William A. Shaw  
County Clerk

LAW OFFICES  
GATES & SEAMAN  
2 NORTH FRONT STREET  
P.O. BOX 846  
CLEARFIELD, PA. 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL :  
TABERNACLE of the CHRISTIAN :  
and MISSIONARY ALLIANCE :

Plaintiff

-vs-

BONNIE C. LASH, a/k/a BONNIE : Filed on behalf of: Plaintiff  
C. LUZIER, MARY KAVALA, :  
WALTER ANDREW KROLICK and : Counsel of Record for this Party:  
AGNES KROLICK, their heirs, : Laurance B. Seaman, Esq.  
personal representatives and:  
assigns, and any other : Supreme Court Record No.:  
parties claiming any right, : 19620  
title or interest in the :  
premises described herein, : GATES & SEAMAN

Defendants

: Attorneys At Law  
: 2 N. Front St.  
: P.O. Box 846  
: Clearfield, PA 16830  
:  
:  
:

FILED  
SEP 10 2001  
William A. Shaw  
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION - LAW

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE :  
Plaintiff :

vs. :

:No. 2001-00903-CD

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

PRAECIPE FOR JUDGMENT

TO WILLIAM A. SHAW, PROTHONOTARY:

Enter final judgment for the Plaintiff and against the  
Defendants, BONNIE C. LASH, a/k/a BONNIE C. LUZIER, MARY KAVALA,  
WALTER ANDREW KROLICK and AGNES KROLICK, for failure to file an  
Answer to the Complaint, a Notice of Intent to Take Default  
Judgment having been given to BONNIE C. LASH, a/k/a BONNIE C.  
LUZIER, MARY KAVALA, WALTER ANDREW KROLICK and AGNES KROLICK, by  
Notice dated July 20, 2001, a photocopy of which is attached  
hereto, together with photocopies of the certificates of mailing;

AND FURTHER enter final judgment in favor of Plaintiff  
and against Defendants, BONNIE C. LASH, a/k/a BONNIE C. LUZIER,  
MARY KAVALA, WALTER ANDREW KROLICK and AGNES KROLICK, their heirs,

personal representatives and assigns, and any other parties claiming any right, title or interest in the premises in question in the above captioned matter for failure of Defendants to comply with the Order of Court dated August 2, 2001, in the above captioned proceedings and it is ordered and decreed that final judgment be entered for Plaintiff, THE CURWENSVILLE GOSPEL TABERNACLE of the CHRISTIAN and MISSIONARY ALLIANCE, as to the premises as described in Exhibit "A" to said Order, and that Plaintiff is seized of an indefeasible title to said premises as aforesaid.

GATES & SEAMAN

BY: 

Attorneys for Plaintiffs

Date: 9/10/01

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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :  
Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Bonnie C. Lash, a/k/a Bonnie C. Luzier  
600 Hill Street  
Curwensville, Pennsylvania 16833

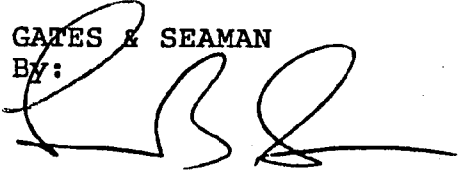
DATE: July 20, 2001

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO TAKE  
ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT  
WITHIN TEN (10) 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 FOLLOWING OFFICE TO FIND  
OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK, COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

GATES & SEAMAN  
By:

  
Laurance B. Seaman, Esquire

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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Mary Kavala  
620 Susquehanna Avenue  
Curwensville, Pennsylvania 16833

DATE: July 20, 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 (10) 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 FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK, COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

GATES & SEAMAN

By:



Laurance B. Seaman, Esquire



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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Walter Andrew Krolick  
434 Chestnut Avenue  
Curwensville, Pennsylvania 16833

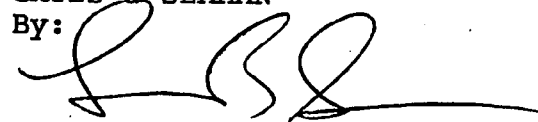
DATE: July 20, 2001

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DAVID S. MEHOLICK, COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

GATES & SEAMAN  
By:



Laurance B. Seaman, Esquire

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

THE CURWENSVILLE GOSPEL TABERNACLE of :  
the CHRISTIAN and MISSIONARY ALLIANCE : No. 2001-00903-CD  
Plaintiff :

vs. :

BONNIE C. LASH, a/k/a BONNIE C. :  
LUZIER, MARY KAVALA, WALTER ANDREW :  
KROLICK, and AGNES KROLICK, their :  
heirs, personal representatives and :  
assigns, and any other parties claiming :  
any right, title or interest in the :  
premises described herein, :

Defendants :

NOTICE OF INTENT TO TAKE DEFAULT JUDGMENT

TO: Agnes Krolick  
434 Chestnut Avenue  
Curwensville, Pennsylvania 16833


DATE: July 20, 2001

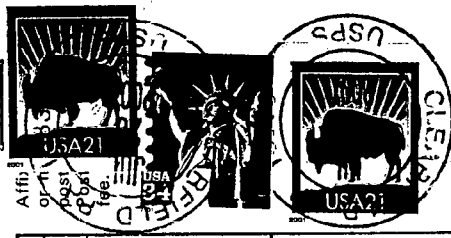
IMPORTANT NOTICE

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ACTION REQUIRED OF YOU IN THIS CASE. UNLESS YOU ACT  
WITHIN TEN (10) DAYS FROM THE DATE OF THIS NOTICE, A  
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OUT WHERE YOU CAN GET LEGAL HELP.

DAVID S. MEHOLICK, COURT ADMINISTRATOR  
Clearfield County Court House  
Clearfield, PA 16830  
(814) 765-2641

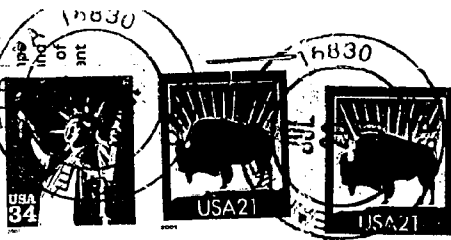
GATES & SEAMAN  
By:

  
Laurance B. Seaman, Esquire



U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:	<b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830
One piece of ordinary mail addressed to:	<b>Agnes Krolick</b> 434 Chestnut Avenue Curwensville, Pennsylvania 16833

PS Form 3817, Mar. 1989



U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:	<b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830
One piece of ordinary mail addressed to:	<b>Bonnie C. Lash, a/k/a</b> <b>Bonnie C. Luzier</b> 600 Hill Street Curwensville, Pennsylvania 16833

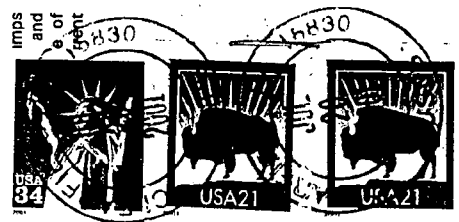
PS Form 3817, Mar. 1989

Affix fee here in stamps  
or meter postage and  
post mark. Inquire of  
Postmaster for current  
fee.



U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:	<b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830
One piece of ordinary mail addressed to:	<b>Walter Andrew Krolick</b> 434 Chestnut Avenue Curwensville, Pennsylvania 16833

PS Form 3817, Mar. 1989



U.S. POSTAL SERVICE MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE-POSTMASTER	<b>CERTIFICATE OF MAILING</b>
Received From:	<b>GATES &amp; SEAMAN</b> 2 North Front Street P.O. Box 846 Clearfield, PA 16830
One piece of ordinary mail addressed to:	<b>Mary Kavala</b> 620 Susquehanna Avenue Curwensville, Pennsylvania 16833

PS Form 3817, Mar. 1989

ALL the Grantor's right, title and interest in and to an unopened portion of Linden Street located between Lots No. 125 and 126 in an unrecorded Plan of Lots known as the Addition to Curwensville Borough on land of E.A. Irvin Estate, dated August, 1922, approximately twenty (20) feet in width and extending approximately two hundred feet, more or less, from the line of Susquehanna Avenue to the line of land now or formerly of Joseph S. Ammerman.

**EXHIBIT "A"**

IN THE COURT OF COMMON PLEAS  
OF CLEARFIELD COUNTY, PENNA  
CIVIL ACTION - LAW  
No. 2001-00903-CD

THE CURWNEVILLE GOSPEL  
TABERNACLE OF THE CHRISTIAN  
and MISSIONARY ALLIANCE  
Plaintiff

vs.

BONNIE C. LASH, a/k/a BONNIE  
C. LUZIER, MARY KAVALA,  
WALTER ANDREW KROLICK and  
AGNES KROLICK, their heirs,  
personal representatives and  
assigns,

Defendants

PRAECIPE FOR JUDGMENT

MC  
C/2:10-10  
RES

LAW OFFICES  
GATES & SEAMAN  
2 NORTH FRONT STREET  
P.O. BOX 846  
CLEARFIELD, PA. 16830