

01-903-CD
CURWENSVILLE GOSPEL TABERNACLE OF -vs- BONNIE C. LASH et al
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 : No. 01-903-CJ
: Type of Case: Civil
:
-vs- : Type of Pleading: COMPLAINT
:
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 TABRNACLE :
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.

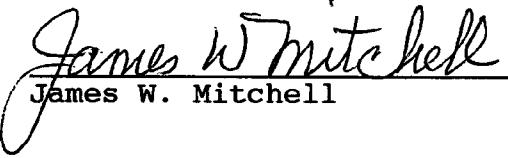
GATES & SEAMAN

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

4/22/84
04/18/84
Atty for
Gates & Seaman
C

LAW OFFICES
GATES & SEAMAN
2 NORTH FRONT STREET
P.O. BOX 816
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

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
My Marilyn Harris
Chester A. Hawkins

Sheriff

FILED

JUL 05 2001
01:28 PM '01
William A. Shaw
Prothonotary
ES

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

THE CURWENSVILLE GOSPEL :
TABERNACLE of the CHRISTIAN :
and MISSIONARY ALLIANCE :
:
Plaintiff :
: No. 2001-00903-CD
: Type of Case: Civil
:
: Type of Pleading:
-vs- : AFFIDAVIT OF SERVICE
:
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
: Attorneys At Law
Defendants :
: 2 N. Front St.
: P.O. Box 846
: Clearfield, PA 16830
:
:

RECEIVED

AUG 01 2001

Shaw
Secretary

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 :

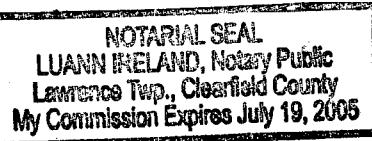
AFFIDAVIT OF SERVICE

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".

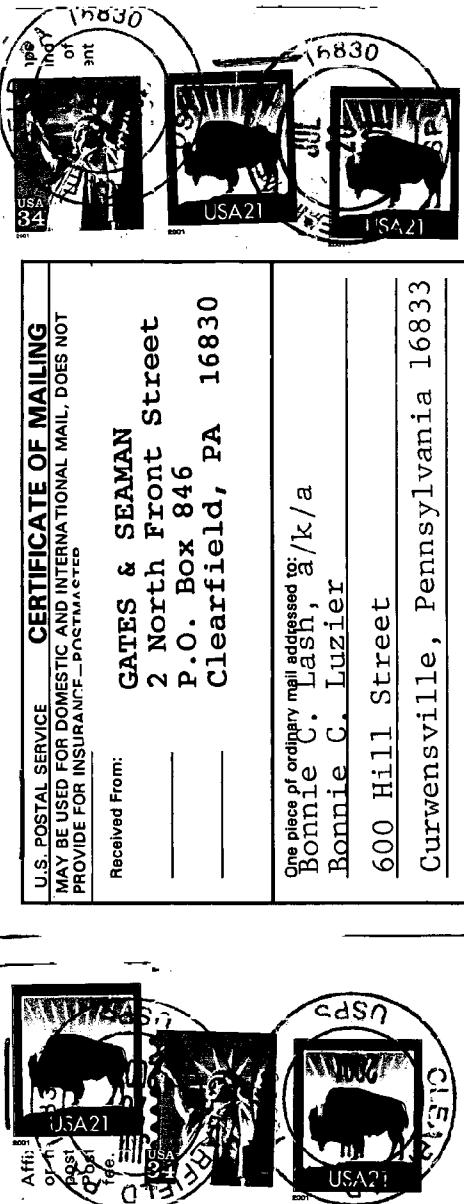


Laurance B. Seaman, Esquire
GATES & SEAMAN

Sworn to and subscribed before
me this 1st day of August, 2001.

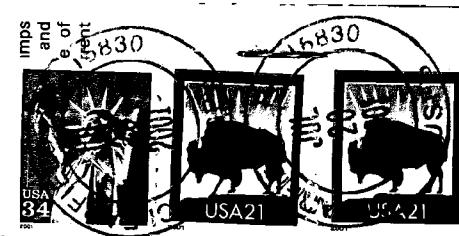


PS Form 3817, Mar. 1



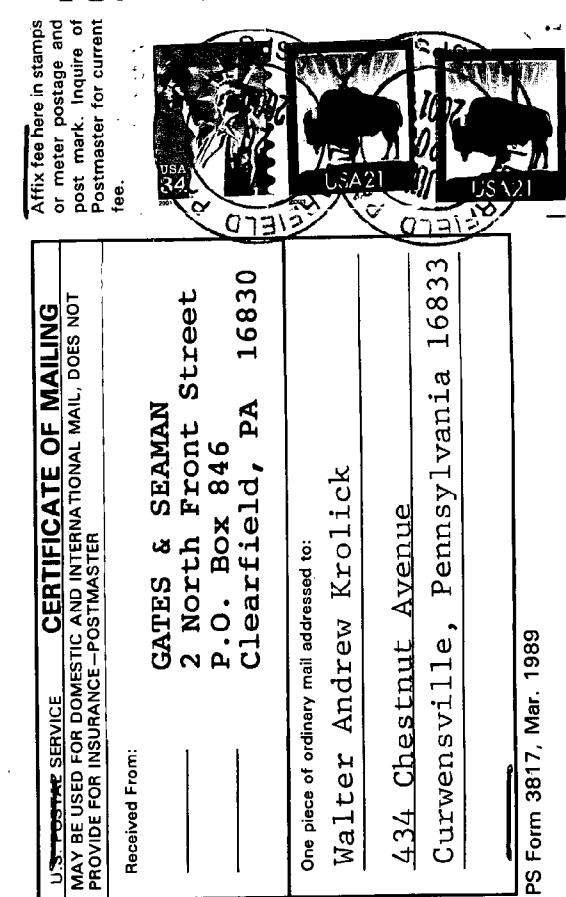
CERTIFICATE OF MAILING	
U.S. POSTAL SERVICE	
MAY BE USED FOR DOMESTIC AND INTERNATIONAL MAIL, DOES NOT PROVIDE FOR INSURANCE—POSTMAILED	
Received From:	GATES & SEAMAN 2 North Front Street P.O. Box 846 Clearfield, PA 16830
<u>One piece of ordinary mail addressed to:</u> <u>Bonnie C. Lash, a/k/a</u> <u>Bonnie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

PS Form 3817, Mar. 1989



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

PS Form 3817: Mar. 1989



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

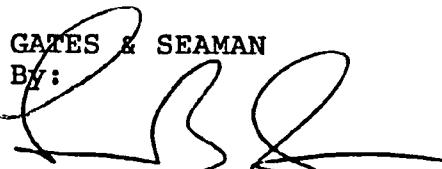
DATE: July 20, 2001

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

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.

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(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.

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Clearfield County Court House
Clearfield, PA 16830
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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
03.30.01
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 :
: No. 2001-00903-CD
: Type of Case: Civil
:
: Type of Pleading:
-vs- : PETITION FOR JUDGMENT
: and ORDER
:
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

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

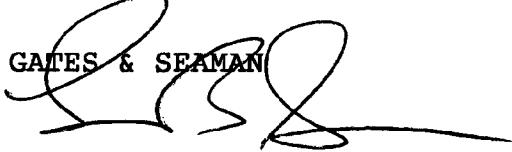
TO THE HONORABLE JUDGE OF SAID COURT:

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

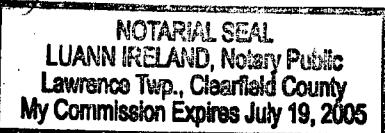
Laurance B. Seaman, Esquire
Attorney for Plaintiffs

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 1ST 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. :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 :
:

FILED

AUG 07 2001

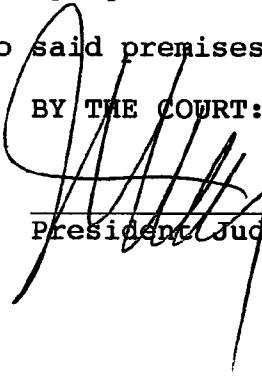
William A. Shaw
Prothonotary

ORDER

AND NOW, this 2nd 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 Praecept 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
13410cc atty docket
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

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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

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AUG 01 2001
DB3017004686
J. A. Shaw
University of Alberta

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 :
: No. 2001-00903-CD
: Type of Case: Civil
:
: Type of Pleading:
-vs- : PRAECIPE FOR JUDGMENT
:
:
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:

Laurence 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

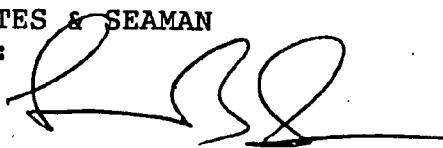
DATE: July 20, 2001

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Clearfield County Court House
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GATES & SEAMAN
By:


Laurence 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

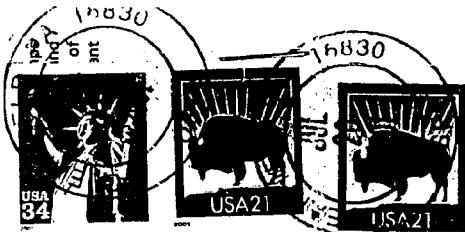
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DAVID S. MEHOLICK, COURT ADMINISTRATOR
Clearfield County Court House
Clearfield, PA 16830
(814) 765-2641

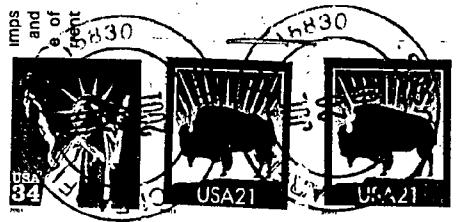
GATES & SEAMAN
By: 

Laurance B. Seaman, Esquire



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

PS Form 3817, Mar. 1989



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

PS Form 3817, Mar. 1989

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

PS Form 3817, Mar. 1989

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

PS Form 3817, Mar. 1989

EXHIBIT "A"

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

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

PRAECLipe FOR JUDGMENT

MC
C(2 : 10-84 ECR

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