

01-1636-CD
GWENDOLYN JANE ADCOCK -vs- SYLVAN RUSSELL CURRY et al

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

GWENDOLYN JANE ADCOCK, : NO. 01 - **1636** - C.D.
Plaintiff : TYPE OF CASE: ACTION TO
VS. : QUIET TITLE
SYLVAN RUSSELL CURRY and : TYPE OF PLEADING: COMPLAINT
MARIE CURRY, husband and : FILED ON BEHALF OF: PLAINTIFF
wife, and their heirs, : COUNSEL OF RECORD:
administrators, executors : CHRISTOPHER E. MOHNEY, ESQUIRE
and assigns, : SUPREME COURT NO.: 63494
Defendants : BLAKLEY, JONES & MOHNEY
: 90 BEAVER DRIVE, BOX 6
: DU BOIS, PA 15801
: (814) 371-2730

FILED
OCT 02 2001

William A. Shaw
Prothonotary

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

| | | | |
|---------------------------|---|----------|--------|
| GWENDOLYN JANE ADCOCK, | : | NO. 01 - | - C.D. |
| | : | | |
| Plaintiff | : | | |
| | : | | |
| VS. | : | | |
| | : | | |
| SYLVAN RUSSELL CURRY and | : | | |
| MARIE CURRY, husband and | : | | |
| wife, and their heirs, | : | | |
| administrators, executors | : | | |
| and assigns, | : | | |
| | : | | |
| Defendants | : | | |

N O T I C E

TO: SYLVAN RUSSELL CURRY and MARIE CURRY, husband and wife,
and their heirs, administrators, executors and assigns

You are hereby notified that an action to quiet title to
premises situate in Sandy Township, Clearfield County,
Pennsylvania, has been filed against you. Said premises are
described as follows:

One (1) acre situated in the Township of Sandy, County of
Clearfield and State of Pennsylvania, bounded on the East
by lands of Gwendolyn Jane Adcock, on the South by the
right-of-way of the Pennsylvania Railroad, on the West by
a parcel of land, now, or formerly, owned by Laurance and
Millie Schriver, and on the North by a section of the
"old" Route 255 (macadam) used as an access road to the
property now, or formerly, of Louis and Mary Ann Cimino.

ALSO DESCRIBED AS

BEGINNING at northeasterly corner of land now or formerly
of Joseph Berry at corner of land and State Highway,
thence along line of State Highway northerly direction
200 feet to a post, thence by lands of Younts, to a post
at the right way of Pennsylvania Railroad in an Easterly
direction 150 feet; thence along line of right-of-way of
Pennsylvania Railroad in a southerly direction 200 feet

to a post, thence in a westerly direction along line of lands now or formerly of Joseph Berry 175 feet to a post at the place of beginning.

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

Court Administrator
Clearfield County Courthouse
Second & Market Streets
Clearfield, Pennsylvania 16830
(814) 765-2641 Ext. 50-51

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

| | | | |
|---------------------------|---|----------|--------|
| GWENDOLYN JANE ADCOCK, | : | NO. 01 - | - C.D. |
| | : | | |
| Plaintiff | : | | |
| | : | | |
| VS. | : | | |
| | : | | |
| SYLVAN RUSSELL CURRY and | : | | |
| MARIE CURRY, husband and | : | | |
| wife, and their heirs, | : | | |
| administrators, executors | : | | |
| and assigns, | : | | |
| | : | | |
| Defendants | : | | |

COMPLAINT

AND NOW, comes the Plaintiff, **GWENDOLYN JANE ADCOCK**, by and through her attorneys, **BLAKLEY, JONES & MOHNEY**, and brings this action to quiet title to the premises hereinafter described against the above-named Defendants and in support thereof avers:

1. Plaintiff **GWENDOLYN JANE ADCOCK** is an adult individual residing at 2837 Oak Meadow Lane, Snellville, Georgia 30078.
2. Defendant **SYLVAN RUSSELL CURRY** had a last known address of R.D. # 2, Du Bois, Clearfield County, Pennsylvania 15801.
3. Defendant **MARIE CURRY** had a last known address of R.D. # 2, Du Bois, Clearfield County, Pennsylvania 15801.
4. The purpose of this action is to quiet title to the following described real estate:

One (1) acre situated in the Township of Sandy, County of Clearfield and State of Pennsylvania, bounded on the East

by lands of Gwendolyn Jane Adcock, on the South by the right-of-way of the Pennsylvania Railroad, on the West by a parcel of land, now, or formerly, owned by Laurance and Millie Schriver, and on the North by a section of the "old" Route 255 (macadam) used as an access road to the property now, or formerly, of Louis and Mary Ann Cimino.

ALSO DESCRIBED AS

BEGINNING at northeasterly corner of land now or formerly of Joseph Berry at corner of land and State Highway, thence along line of State Highway northerly direction 200 feet to a post, thence by lands of Younts, to a post at the right way of Pennsylvania Railroad in an Easterly direction 150 feet; thence along line of right-of-way of Pennsylvania Railroad in a southerly direction 200 feet to a post, thence in a westerly direction along line of lands now or formerly of Joseph Berry 175 feet to a post at the place of beginning.

5. By Deed dated April 20, 1940, and recorded July 5, 1940, in Clearfield County Deed Book Volume 326, page 274, Joseph Berry conveyed the above-described property to **SYLVAN RUSSELL CURRY** and **MARIE CURRY**, husband and wife.

6. That on December 2, 1946, the above-described property was sold by the County Treasurer of Clearfield County, Pennsylvania, to the Clearfield County Commissioners, Pennsylvania, for unpaid real estate taxes.

7. That by Deed dated February 10, 1947, and recorded February 10, 1947, in Clearfield County Deed Book Volume 518, page 43, the County Treasurer of Clearfield County, Pennsylvania, conveyed the above-described property to the Clearfield County Commissioners.

8. By Deed dated August 10, 1950, and recorded August 11, 1950, in Clearfield County Deed Book Volume 518, page 45, the

Clearfield County Commissioners conveyed the above-described property to Ervin E. Yount and Caroline K. Yount.

9. By Deed dated July 6, 1980, and recorded July 23, 1980, in Clearfield County Deed Book Volume 799, page 499, Carolyn K. Yount, widow, conveyed the above-described property to Plaintiff Gwendolyn Jane Adcock.

10. No third party has ever made any claim of any kind to ownership of interest in or claimed to or upon the property except as set forth in this Complaint.

11. This action is brought to clear any and all clouds on the title to the ownership in interest to the property described in Paragraph 4 of this Complaint which the herein named Defendants, their heirs, devisees, executors, administrators, successors and assigns and all other person, persons, partnerships or corporate entities in interest or their legal representatives might claim, possess or assert pertaining to any alleged irregularities in the chain of title herein set forth.

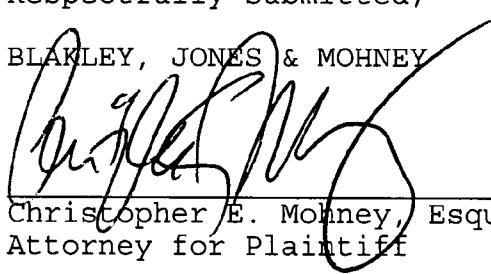
12. This suit to quiet title is instituted under the terms and provisions of the Pennsylvania Rules of Civil Procedure 1061 to 1067, inclusive, pertaining to the quieting of titles and other pertinent rules of local procedure.

WHEREFORE, your Plaintiff requests this Honorable Court to decree that title to the above-described property in Paragraph 4 of this Complaint is in the name of Plaintiff **GWENDOLYN JANE ADCOCK** and that the Defendants, their executors, administrators and

assigns and all other person, persons, firms, partnerships or corporate entities in interest or their legal representatives be forever barred from asserting any right, title, lien or interest in the land in question that is inconsistent with the interest of the Plaintiff as set forth herein to the said premises or impeaching, denying or in any way attacking the Plaintiff's title to the said premises; and that your Honorable Court make any other order necessary for the granting of proper relief as it deems necessary to equitably and legally recognize and preserve Plaintiff's rights in this matter.

Respectfully submitted,

BLAKLEY, JONES & MOHNEY



Christopher E. Mohney, Esquire
Attorney for Plaintiff

VERIFICATION

I, **GWENDOLYN JANE ADCOCK**, being duly authorized to make this verification, have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to the penalties of 18 Pa. C. S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Gwendolyn Jane Adcock
Gwendolyn Jane Adcock

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW
NO. 01 - - C.D.

GWENDOLYN JANE ADCOCK,

Plaintiff

VS.

SYLVAN RUSSELL CURRY and
MARIE CURRY, husband and wife,
and their heirs, administrators,
executors and assigns,

Defendants

COMPLAINT

LAW OFFICES
BLAKLEY, JONES & MOHNEY
90 BEAVER DRIVE - BOX 6
DUBOIS, PA 15801

FILED

OCT 02 2001
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William A. Shaw
Prothonotary

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

GWENDOLYN JANE ADCOCK, : NO. 01 -1636- C.D.
Plaintiff :
VS. : TYPE OF CASE: ACTION TO
SYLVAN RUSSELL CURRY and : QUIET TITLE
MARIE CURRY, husband and :
wife, and their heirs, :
administrators, executors :
and assigns, : TYPE OF PLEADING: MOTION FOR
: SERVICE OF COMPLAINT ON
: DEFENDANTS BY PUBLICATION
Defendants : FILED ON BEHALF OF: PLAINTIFF
: COUNSEL OF RECORD:
: CHRISTOPHER E. MOHNEY, ESQUIRE
: SUPREME COURT NO.: 63494
: BLAKLEY, JONES & MOHNEY
: 90 BEAVER DRIVE, BOX 6
: DU BOIS, PA 15801
: (814) 371-2730

FILED
OCT 02 2001

William A. Shaw
Prothonotary

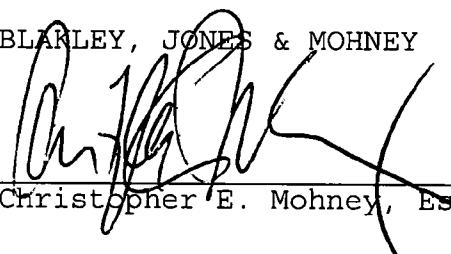
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW

GWENDOLYN JANE ADCOCK, : NO. 01 - - C.D.
Plaintiff :
VS. :
SYLVAN RUSSELL CURRY and :
MARIE CURRY, husband and :
wife, and their heirs, :
administrators, executors :
and assigns, :
Defendants :

MOTION FOR SERVICE OF COMPLAINT ON DEFENDANTS BY PUBLICATION

AND NOW, this 2 day of October, 2001, Affidavit
having been executed and filed by the Plaintiff that the identity
and whereabouts of the Defendants, their heirs and assigns are
unknown, Plaintiff, by her attorneys, BLAKLEY, JONES & MOHNEY,
moves the Court for leave to serve the Complaint on the above-
mentioned Defendants, their heirs and assigns, by publication in
such a manner as the Court shall direct, as provided by the
Pennsylvania Rules of Civil Procedure No. 410 and 430(b).

BLAKLEY, JONES & MOHNEY


Christopher E. Mohney, Esquire

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

| | | | |
|---------------------------|---|----------|--------|
| GWENDOLYN JANE ADCOCK, | : | NO. 01 - | - C.D. |
| | : | | |
| Plaintiff | : | | |
| | : | | |
| VS. | : | | |
| | : | | |
| SYLVAN RUSSELL CURRY and | : | | |
| MARIE CURRY, husband and | : | | |
| wife, and their heirs, | : | | |
| administrators, executors | : | | |
| and assigns, | : | | |
| | : | | |
| Defendants | : | | |

AFFIDAVIT

| | | |
|------------------------------|---|-----|
| COMMONWEALTH OF PENNSYLVANIA | : | |
| | : | SS. |
| COUNTY OF CLEARFIELD | : | |

GWENDOLYN JANE ADCOCK, being duly sworn according to law, deposes and says that she is the Plaintiff in the above-captioned matter and she has been unable to discover the whereabouts and identity of SYLVAN RUSSELL CURRY and MARIE CURRY, husband and wife, the above-named Defendants, their heirs and assigns, and has caused the records in the offices of the Register and Recorder of Clearfield County to be examined to ascertain the date of death of the Defendants, whether they died testate or intestate, the names and addresses of all of the Defendants' heirs, legatees or devisees, and whether or not there has been any adverse conveyance of the real estate that is subject to suit and that she has made a

good faith effort to locate the whereabouts of the Defendants.

Gwendolyn Jane Adcock
Gwendolyn Jane Adcock

Sworn to and subscribed
before me this 10
day of September, 2001.

Eloise P. Lyon
Notary Public

Notary Public, Fulton County, Georgia
My Commission Expires November 22, 2003

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

| | | | |
|---------------------------|---|----------|--------|
| GWENDOLYN JANE ADCOCK, | : | NO. 01 - | - C.D. |
| | : | | |
| Plaintiff | : | | |
| | : | | |
| VS. | : | | |
| | : | | |
| SYLVAN RUSSELL CURRY and | : | | |
| MARIE CURRY, husband and | : | | |
| wife, and their heirs, | : | | |
| administrators, executors | : | | |
| and assigns, | : | | |
| | : | | |
| Defendants | : | | |

O R D E R

AND NOW, this 3rd day of October, 2001, upon consideration of the foregoing Plaintiff's Motion for Service of Complaint on Defendants by Publication, the Plaintiff is granted leave to make service of the Complaint on the Defendants, and their heirs, administrators, executors and assigns, by publication once in the Courier-Express, a newspaper of general circulation in Clearfield County, Pennsylvania, and once in the Clearfield County Legal Journal according to the attached notice.

BY THE COURT,

FILED

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William A. Shaw
Prothonotary

FILED

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1cc a/H: Blatney

(EM)

William A. Shaw
Prothonotary

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

GWENDOLYN JANE ADCOCK, : NO. 01 - - C.D.
Plaintiff :
VS. :
SYLVAN RUSSELL CURRY and :
MARIE CURRY, husband and :
wife, and their heirs, :
administrators, executors :
and assigns, :
Defendants :

ACTION TO QUIET TITLE

NO. 01 - - C.D.

TO: SYLVAN RUSSELL CURRY and MARIE CURRY, husband and wife,
and their heirs, administrators, executors and assigns

You are hereby notified that an action to quiet title to
premises situate in the Township of Sandy, Clearfield County,
Pennsylvania, has been filed against you. Said premises are
described as follows:

One (1) acre situated in the Township of Sandy, County of
Clearfield and State of Pennsylvania, bounded on the East
by lands of Gwendolyn Jane Adcock, on the South by the
right-of-way of the Pennsylvania Railroad, on the West by
a parcel of land, now, or formerly, owned by Laurance and
Millie Schriver, and on the North by a section of the
"old" Route 255 (macadam) used as an access road to the
property now, or formerly, of Louis and Mary Ann Cimino.

ALSO DESCRIBED AS

BEGINNING at northeasterly corner of land now or formerly
of Joseph Berry at corner of land and State Highway,
thence along line of State Highway northerly direction
200 feet to a post, thence by lands of Younts, to a post
at the right way of Pennsylvania Railroad in an Easterly

direction 150 feet; thence along line of right-of-way of Pennsylvania Railroad in a southerly direction 200 feet to a post, thence in a westerly direction along line of lands now or formerly of Joseph Berry 175 feet to a post at the place of beginning.

You have been sued in Court. The purpose of this quiet title action is to extinguish any right or equity which the Defendants above named and their heirs, administrators, executors and assigns may have in the property as described above. The Plaintiffs in this action, after diligent search, have been unable to locate the Defendants or their devisee or heirs.

Whereupon, the Court ordered that notice of said action be served on the Defendants, and their heirs, administrators, executors and assigns, by advertisement requiring Defendants above-named and their heirs, administrators, executors and assigns to answer the Complaint within twenty (20) days from date of this publication.

NOTICE

IF YOU WISH TO DEFEND, YOU MUST ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE YOUR DEFENSE OR OBJECTIONS IN WRITING WITH THE COURT. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT FURTHER NOTICE FOR THE 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
Clearfield County Courthouse
Second & Market Streets
Clearfield, Pennsylvania 16830
(814) 765-2641, Ext. 50-51

Christopher E. Mohney, Esquire
BLAKLEY, JONES & MOHNEY
90 Beaver Drive, Box 6
Du Bois, PA 15801
(814) 371-2730
Attorney for Plaintiff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW
No. 01 - - C.D.

GWENDOLYN JANE ADCOCK,

Plaintiff

vs.

SYLVAN RUSSELL CURRY and
MARIE CURRY, husband and wife,
and their heirs, administrators,
executors and assigns,

Defendants

MOTION FOR SERVICE OF COMPLAINT
ON DEFENDANTS BY PUBLICATION

LAW OFFICES
BLAKLEY, JONES & MOHNEY
90 BEAVER DRIVE - BOX 6
DUBOIS, PA 15801

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OCT 02 2001
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW

GWENDOLYN JANE ADCOCK, : NO. 01 - 1636 - C.D.
Plaintiff :
VS. : TYPE OF CASE: ACTION TO
SYLVAN RUSSELL CURRY and : QUIET TITLE
MARIE CURRY, husband and :
wife, and their heirs, :
administrators, executors :
and assigns, :
Defendants : TYPE OF PLEADING: ORDER
: FILED ON BEHALF OF: PLAINTIFF
: COUNSEL OF RECORD:
: CHRISTOPHER E. MOHNEY, ESQUIRE
: SUPREME COURT NO.: 63494
: BLAKLEY, JONES & MOHNEY
: 90 BEAVER DRIVE, BOX 6
: DU BOIS, PA 15801
: (814) 371-2730

FILED

NOV 16 2001

William A. Shaw
Prothonotary

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

| | | |
|---------------------------|---|----------------------|
| GWENDOLYN JANE ADCOCK, | : | NO. 01 - 1636 - C.D. |
| | : | |
| Plaintiff | : | |
| | : | |
| VS. | : | |
| | : | |
| SYLVAN RUSSELL CURRY and | : | |
| MARIE CURRY, husband and | : | |
| wife, and their heirs, | : | |
| administrators, executors | : | |
| and assigns, | : | |
| | : | |
| Defendants | : | |

O R D E R

AND NOW, this 16th day of November, 2001, it appearing on Motion of BLAKLEY, JONES & MOHNEY, ESQUIRES, Attorneys for the Plaintiff that service of Complaint in the above-captioned quiet title action as per Order of Court was served on the Defendants by publication once a week in the Courier-Express, a newspaper of general circulation in Clearfield County, Pennsylvania, and once in the Clearfield County Legal Journal, and that the identity and whereabouts of the Defendants, theirs heirs, administrators, executors and assigns are unknown, it appearing that no answer has been filed nor any appearance entered by the named Defendants nor their duly authorized representatives for more than twenty (20) days since the dates of publication it is hereby ORDERED:

1. That **SYLVAN RUSSELL CURRY and MARIE CURRY**, and their heirs, administrators, executors and assigns, are forever barred from asserting any right, title lien or interest inconsistent with the interest of claim of the Plaintiff as set forth in her

Complaint in and to the following parcel of land bounded and described as follows, to wit:

One (1) acre situated in the Township of Sandy, County of Clearfield and State of Pennsylvania, bounded on the East by lands of Gwendolyn Jane Adcock, on the South by the right-of-way of the Pennsylvania Railroad, on the West by a parcel of land, now, or formerly, owned by Laurance and Millie Schriver, and on the North by a section of the "old" Route 255 (macadam) used as an access road to the property now, or formerly, of Louis and Mary Ann Cimino.

ALSO DESCRIBED AS

BEGINNING at northeasterly corner of land now or formerly of Joseph Berry at corner of land and State Highway, thence along line of State Highway northerly direction 200 feet to a post, thence by lands of Younts, to a post at the right way of Pennsylvania Railroad in an Easterly direction 150 feet; thence along line of right-of-way of Pennsylvania Railroad in a southerly direction 200 feet to a post, thence in a westerly direction along line of lands now or formerly of Joseph Berry 175 feet to a post at the place of beginning.

This Order to be final and absolute unless the aforesaid Defendants shall file exceptions to this Order within thirty (30) days of the date hereof.

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

3. That the right of the Plaintiff in the premises is at all times superior to the rights of the named Defendants and that Plaintiff's title is in fee simple to the premises described in the Complaint against the Defendants.

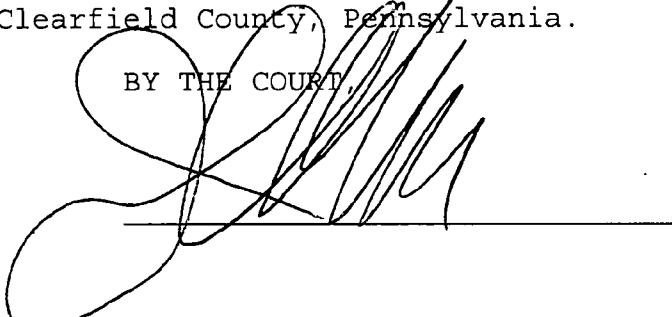
4. That the Defendants or any person claiming under them shall be forever enjoined from setting up any title to the premises of the Plaintiff described in the Complaint and from impeaching,

denying or in any way attacking the title to the Plaintiff to premises.

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

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

BY THE COURT,



IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW
NO. 01 - 1636 - C.D.

GWENDOLYN JANE ADCOCK,

Plaintiff

vs.

SYLVAN RUSSELL CURRY and
MARIE CURRY, husband and
wife, and their heirs,
administrators, executors
and assigns,

Defendants

ORDER

FILED

NOV 16 2001

cc: atty mchm
William A. Shaw
Prothonotary

Copy from party

LAW OFFICES
BLAKLEY, JONES & MOHNEY
90 BEAVER DRIVE - BOX 6
DUBOIS, PA 15801

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

GWENDOLYN JANE ADCOCK, : NO. 01 - 1636 - C.D.
Plaintiff :
VS. : TYPE OF CASE: ACTION TO
SYLVAN RUSSELL CURRY and : QUIET TITLE
MARIE CURRY, husband and :
wife, and their heirs, :
administrators, executors :
and assigns, :
Defendants : TYPE OF PLEADING: MOTION FOR
: DEFAULT JUDGMENT
: FILED ON BEHALF OF: PLAINTIFF
: COUNSEL OF RECORD:
: CHRISTOPHER E. MOHNEY, ESQUIRE
: SUPREME COURT NO.: 63494
: BLAKLEY, JONES & MOHNEY
: 90 BEAVER DRIVE, BOX 6
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: (814) 371-2730

FILED

NOV 15 2001

William A. Shaw
Prothonotary

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

| | | |
|---------------------------|---|----------------------|
| GWENDOLYN JANE ADCOCK, | : | NO. 01 - 1636 - C.D. |
| | : | |
| Plaintiff | : | |
| | : | |
| VS. | : | |
| | : | |
| SYLVAN RUSSELL CURRY and | : | |
| MARIE CURRY, husband and | : | |
| wife, and their heirs, | : | |
| administrators, executors | : | |
| and assigns, | : | |
| | : | |
| Defendants | : | |

MOTION FOR DEFAULT JUDGMENT

AND NOW, comes the Plaintiff, **GWENDOLYN JANE ADCOCK**, by and through her attorneys, **BLAKLEY, JONES & MOHNEY**, and files this Motion for Default Judgment in the above-captioned action and in support thereof avers:

1. This is an action to quiet title in which Plaintiff **GWENDOLYN JANE ADCOCK** requests that Defendants **SYLVAN RUSSELL CURRY** and **MARIE CURRY**, and their heirs, administrators, executors and assigns, and all other person, persons, firms, partnerships or corporate entities in interest or their legal representatives be forever barred from asserting any right, title, liens or interests in or impeaching, levying or in any way attack the Plaintiff's title to the land described in Plaintiff's Complaint. A true and correct copy of Plaintiff's Complaint is attached as Exhibit "A".

2. That by Order of this Court dated October 3, 2001, the Plaintiff was given leave to serve the Complaint filed in the above-captioned quiet title action by publication once in the Courier-Express, a newspaper of general circulation in Clearfield County, Pennsylvania, and once in the Clearfield County Legal Journal, the service by publication being allowed upon Motion and Affidavit filed by Plaintiff that the whereabouts of the Defendants **SYLVAN RUSSELL CURRY and MARIE CURRY**, and their heirs, administrators, executors and assigns, are unknown.

3. That pursuant to the Order of Court dated October 3, 2001, publication was made in the Courier-Express on October 12, 2001, and in the Clearfield County Legal Journal on the week of October 19, 2001, Volume 13, No. 42. Respective Proofs of Publication are attached as Exhibit "B".

4. That more than twenty (20) days have passed since last service of the Complaint and no appearance nor answer to the Complaint has been filed by the Defendants, their heirs, administrators, executors and assigns.

5. Attached as Exhibit "C" is an Affidavit stating that a Complaint was served by publication once in the Courier-Express and once in the Clearfield County Legal Journal and more than twenty (20) days have elapsed since service and that Defendants, or anyone claiming under Defendants, have not entered an appearance or filed an answer to the Complaint.

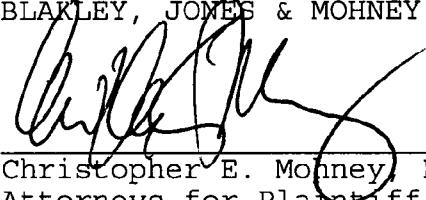
6. Pennsylvania Rule Civil Procedure No. 1066(a) allows this

Honorable Court to grant appropriate relief upon affidavit that a Complaint containing notice the Defendant has been served and Defendant has not filed an answer.

WHEREFORE, your Honorable Court is respectfully requested to enter an Order for Judgment for the Plaintiffs as prescribed by Pennsylvania Rule of Civil Procedure 1066.

Respectfully submitted,

BLAKLEY, JONES & MOHNEY



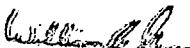
Christopher E. Mohney, Esquire
Attorneys for Plaintiff

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

GWENDOLYN JANE ADCOCK, : NO. 01 - 1636- C.D.
Plaintiff : TYPE OF CASE: ACTION TO
VS. : QUIET TITLE
SYLVAN RUSSELL CURRY and : TYPE OF PLEADING: COMPLAINT
MARIE CURRY, husband and : FILED ON BEHALF OF: PLAINTIFF
wife, and their heirs, : COUNSEL OF RECORD:
administrators, executors : CHRISTOPHER E. MOHNEY, ESQUIRE
and assigns, : SUPREME COURT NO.: 63494
Defendants : BLAKLEY, JONES & MOHNEY
: 90 BEAVER DRIVE, BOX 6
: DU BOIS, PA 15801
: (814) 371-2730

I hereby certify this to be a true |
and attested copy of the original |
statement filed in this case.

OCT 02 2001

Attest: 
Prothonotary

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

GWENDOLYN JANE ADCOCK, : NO. 01 - - C.D.
: Plaintiff :
: VS. :
: SYLVAN RUSSELL CURRY and :
: MARIE CURRY, husband and :
: wife, and their heirs, :
: administrators, executors :
: and assigns, :
: Defendants :
:

N O T I C E

TO: SYLVAN RUSSELL CURRY and MARIE CURRY, husband and wife,
and their heirs, administrators, executors and assigns

You are hereby notified that an action to quiet title to
premises situate in Sandy Township, Clearfield County,
Pennsylvania, has been filed against you. Said premises are
described as follows:

One (1) acre situated in the Township of Sandy, County of
Clearfield and State of Pennsylvania, bounded on the East
by lands of Gwendolyn Jane Adcock, on the South by the
right-of-way of the Pennsylvania Railroad, on the West by
a parcel of land, now, or formerly, owned by Laurance and
Millie Schriver, and on the North by a section of the
"old" Route 255 (macadam) used as an access road to the
property now, or formerly, of Louis and Mary Ann Cimino.

ALSO DESCRIBED AS

BEGINNING at northeasterly corner of land now or formerly
of Joseph Berry at corner of land and State Highway,
thence along line of State Highway northerly direction
200 feet to a post, thence by lands of Younts, to a post
at the right way of Pennsylvania Railroad in an Easterly
direction 150 feet; thence along line of right-of-way of
Pennsylvania Railroad in a southerly direction 200 feet

to a post, thence in a westerly direction along line of lands now or formerly of Joseph Berry 175 feet to a post at the place of beginning.

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

Court Administrator
Clearfield County Courthouse
Second & Market Streets
Clearfield, Pennsylvania 16830
(814) 765-2641 Ext. 50-51

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

GWENDOLYN JANE ADCOCK, : NO. 01 - - C.D.
: Plaintiff :
: VS. :
: SYLVAN RUSSELL CURRY and :
: MARIE CURRY, husband and :
: wife, and their heirs, :
: administrators, executors :
: and assigns, :
: Defendants :
:

COMPLAINT

AND NOW, comes the Plaintiff, **GWENDOLYN JANE ADCOCK**, by and through her attorneys, **BLAKLEY, JONES & MOHNEY**, and brings this action to quiet title to the premises hereinafter described against the above-named Defendants and in support thereof avers:

1. Plaintiff **GWENDOLYN JANE ADCOCK** is an adult individual residing at 2837 Oak Meadow Lane, Snellville, Georgia 30078.
2. Defendant **SYLVAN RUSSELL CURRY** had a last known address of R.D. # 2, Du Bois, Clearfield County, Pennsylvania 15801.
3. Defendant **MARIE CURRY** had a last known address of R.D. # 2, Du Bois, Clearfield County, Pennsylvania 15801.
4. The purpose of this action is to quiet title to the following described real estate:

One (1) acre situated in the Township of Sandy, County of Clearfield and State of Pennsylvania, bounded on the East

by lands of Gwendolyn Jane Adcock, on the South by the right-of-way of the Pennsylvania Railroad, on the West by a parcel of land, now, or formerly, owned by Laurance and Millie Schriver, and on the North by a section of the "old" Route 255 (macadam) used as an access road to the property now, or formerly, of Louis and Mary Ann Cimino.

ALSO DESCRIBED AS

BEGINNING at northeasterly corner of land now or formerly of Joseph Berry at corner of land and State Highway, thence along line of State Highway northerly direction 200 feet to a post, thence by lands of Younts, to a post at the right way of Pennsylvania Railroad in an Easterly direction 150 feet; thence along line of right-of-way of Pennsylvania Railroad in a southerly direction 200 feet to a post, thence in a westerly direction along line of lands now or formerly of Joseph Berry 175 feet to a post at the place of beginning.

5. By Deed dated April 20, 1940, and recorded July 5, 1940, in Clearfield County Deed Book Volume 326, page 274, Joseph Berry conveyed the above-described property to **SYLVAN RUSSELL CURRY** and **MARIE CURRY**, husband and wife.

6. That on December 2, 1946, the above-described property was sold by the County Treasurer of Clearfield County, Pennsylvania, to the Clearfield County Commissioners, Pennsylvania, for unpaid real estate taxes.

7. That by Deed dated February 10, 1947, and recorded February 10, 1947, in Clearfield County Deed Book Volume 518, page 43, the County Treasurer of Clearfield County, Pennsylvania, conveyed the above-described property to the Clearfield County Commissioners.

8. By Deed dated August 10, 1950, and recorded August 11, 1950, in Clearfield County Deed Book Volume 518, page 45, the

Clearfield County Commissioners conveyed the above-described property to Ervin E. Yount and Caroline K. Yount.

9. By Deed dated July 6, 1980, and recorded July 23, 1980, in Clearfield County Deed Book Volume 799, page 499, Carolyn K. Yount, widow, conveyed the above-described property to Plaintiff Gwendolyn Jane Adcock.

10. No third party has ever made any claim of any kind to ownership of interest in or claimed to or upon the property except as set forth in this Complaint.

11. This action is brought to clear any and all clouds on the title to the ownership in interest to the property described in Paragraph 4 of this Complaint which the herein named Defendants, their heirs, devisees, executors, administrators, successors and assigns and all other person, persons, partnerships or corporate entities in interest or their legal representatives might claim, possess or assert pertaining to any alleged irregularities in the chain of title herein set forth.

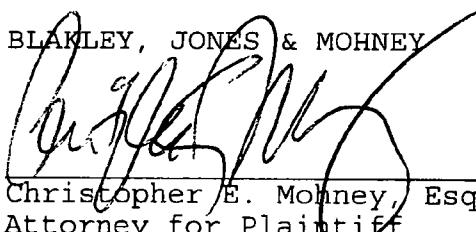
12. This suit to quiet title is instituted under the terms and provisions of the Pennsylvania Rules of Civil Procedure 1061 to 1067, inclusive, pertaining to the quieting of titles and other pertinent rules of local procedure.

WHEREFORE, your Plaintiff requests this Honorable Court to decree that title to the above-described property in Paragraph 4 of this Complaint is in the name of Plaintiff **GWENDOLYN JANE ADCOCK** and that the Defendants, their executors, administrators and

assigns and all other person, persons, firms, partnerships or corporate entities in interest or their legal representatives be forever barred from asserting any right, title, lien or interest in the land in question that is inconsistent with the interest of the Plaintiff as set forth herein to the said premises or impeaching, denying or in any way attacking the Plaintiff's title to the said premises; and that your Honorable Court make any other order necessary for the granting of proper relief as it deems necessary to equitably and legally recognize and preserve Plaintiff's rights in this matter.

Respectfully submitted,

BLAKLEY, JONES & MOHNEY


Christopher E. Mohney, Esquire
Attorney for Plaintiff

VERIFICATION

I, **GWENDOLYN JANE ADCOCK**, being duly authorized to make this verification, have read the foregoing Complaint. The statements therein are correct to the best of my personal knowledge or information and belief.

This statement and verification is made subject to the penalties of 18 Pa. C. S. Section 4904 relating to unsworn fabrication to authorities, which provides that if I make knowingly false averments I may be subject to criminal penalties.

Gwendolyn Jane Adcock
Gwendolyn Jane Adcock

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

Gwendolyn Jane Adcock,

Plaintiff

vs.

SYLVAN RUSSELL CURRY and
MARIE CURRY, husband and
wife, and their heirs,
administrators, executors
and assigns.

Defendants

NO. 01-1636-C.D.

ACTION TO QUIET TITLE

NO. 01-1636-C.D.

TO: SYLVAN RUSSELL CURRY and MARIE CURRY, husband and
wife, and their heirs, administrators, executors and assigns

You are hereby notified that an action to quiet title to premises situated in the Township of Sandy, Clearfield County, Pennsylvania, has been filed against you. Said premises are described as follows:

One (1) acre situated in the Township of Sandy, County of Clearfield and State of Pennsylvania, bounded on the East by lands of Gwendolyn Jane Adcock, on the South by the right-of-way of the Pennsylvania Railroad, on the West by a parcel of land, now, or formerly, owned by Laurence and Millie Schriner, and on the North by a section of the "old" Route 255 (macadam) used as an access road to the property now, or formerly, of Louis and Mary Ann Cirino.

ALSO DESCRIBED AS

BEGINNING at northeasterly corner of land now or formerly of Joseph Berry at corner of land and State Highway, thence along line of State Highway, northerly direction 200 feet to a post, thence by lands of Younts, to a post at the right of way of Pennsylvania Railroad in an Easterly direction 150 feet; then along line of right-of-way of Pennsylvania Railroad in a southerly direction 200 feet to a post, thence in a westerly direction along line of lands now or formerly of Joseph Berry 175 feet to a post at the place of beginning.

You have been sued in Court. The purpose of this quiet title action is to extinguish any right or equity which the Defendants above named and their heirs, administrators, executors and assigns may have in the property as described above. The Plaintiffs in this action, after diligent search, have been unable to locate the Defendants or their devisees or heirs.

Whereupon, the Court ordered that notice of said action be served on the Defendants, and their heirs, administrators, executors and assigns, by advertisement requiring Defendants above-named and their heirs, administrators, executors and assigns to answer the Complaint within twenty (20) days from date of this publication.

NOTICE

YOU WISH TO DEFEND, YOU MUST ENTER A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILE YOUR DEFENSE OR OBJECTIONS IN WRITING WITH THE COURT. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU WITHOUT FURTHER NOTICE FOR THE BELIEF 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
Clearfield County Courthouse
Second & Market Streets
Clearfield, Pennsylvania 16830
(814) 765-2641, Ext. 50-51

Christopher E. Mohney, Esquire
BLAKLEY, JONES & MOHNEY
90 Beaver Drive, Box 6
DuBois, PA 15801
(814) 371-2730
Attorney for Plaintiff

**PROOF OF PUBLICATION OF NOTICE APPEARING IN THE
COURIER EXPRESS/TRI-COUNTY SUNDAY
PUBLISHED BY McLEAN PUBLISHING COMPANY,
DUBOIS PENNSYLVANIA**

Under act 587, Approved May 16, 1929, P.L. 1784

**STATE OF PENNSYLVANIA
COUNTY OF CLEARFIELD**

SS:

Linda Smith, Advertising Director of the **Courier-Express/Tri-County Sunday**, of the County and State aforesaid, being duly sworn, deposes and says that the **Courier-Express**, a daily newspaper and the **Tri-County Sunday**, a weekly newspaper published by McLean Publishing Company at 500 Jeffers Street, City of DuBois, County and State aforesaid, which was established in the year 1879, since which date said, the daily publication and the weekly publication, has been regularly issued in said County, and that a copy of the printed notice of publication is attached hereto exactly as the same was printed and published in the regular editions of the paper on the following dates, viz: the

12th.

day of October A.D. 2001

Affidavit further deposes that he is an officer duly authorized by the **Courier-Express**, a daily newspaper, and/or **Tri-County Sunday**, a weekly newspaper, to verify the foregoing statement under oath and also declared that affiant is not interested in the subject matter of the aforesaid notice of publication, and that all allegations in the foregoing statement as to time, place and character of publication are true.

**McLEAN PUBLISHING COMPANY Publisher of
COURIER-EXPRESS/TRI-COUNTY SUNDAY**

By Linda Smith

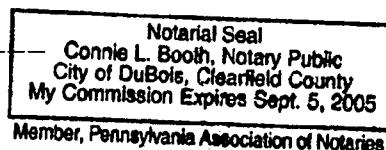
Sworn and subscribed to before me this 17th day of October, 2001

Connie L. Booth

Notary Public

Statement of Advertising Cost
McLEAN PUBLISHING COMPANY

Publisher of
COURIER-EXPRESS/TRI-COUNTY SUNDAY
DuBois, PA



**THIS IS
NOT A
BILL**

TO Blakley, Jones & Mohney-Quiet Title-G. Adcock
For publishing the notice or advertisement
attached hereto on the above stated dates.....\$ 224.64
Probating same.....\$ 4.25
Total.....\$ 228.89

Publisher's Receipt for Advertising Costs

The **Courier-Express**, a daily newspaper, and/or **Tri-County Sunday**, a weekly newspaper, hereby acknowledges receipt of the aforesaid advertising and publication costs, and certifies that the same have been fully paid.

Office: Jeffers Street and Beaver Drive, DuBois, PA 15801
Established 1879, Phone 814-371-4200

McLEAN PUBLISHING COMPANY
Publisher of
COURIER-EXPRESS/TRI-COUNTY SUNDAY

By _____

I hereby certify that the foregoing is the original Proof of Publication and receipt for the Advertising costs in the subject matter of said notice.

ATTORNEY FOR

EXHIBIT "B"

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

:

COUNTY OF CLEARFIELD :

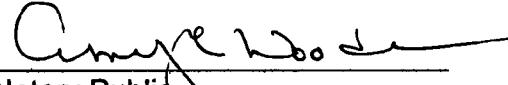
:

On this 24th day of October AD 2001, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro 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 October 19, 2001, Vol. 13 No. 42. And that all of the allegations of this statement as to the time, place, and character of the publication are true.

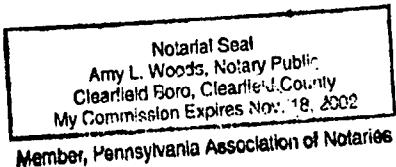


Gary A. Knaresboro, Esquire
Editor

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



Notary Public
My Commission Expires



Blakley Jones & Mohney
90 Beaver Drive, Box 6
DuBois PA 15801

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

GWENDOLYN JANE ADCOCK,
Plaintiff vs. SYLVAN RUSSELL CURRY
and MARIE CURRY, husband and wife,
and their heirs, administrators, executors
and assigns, Defendants.

QUIET TITLE ACTION NOTICE
No. 01-1636-CD

TO: SYLVAN RUSSELL CURRY and
MARIE CURRY, husband and wife, and
their heirs, administrators, executors and
assigns.

You are hereby notified that an action to
quiet title to the premises situate, in the
Township of Sandy, Clearfield County,
Pennsylvania, has been filed against you.
Said premises are described as follows:

One (1) acre situated in the Township
of Sandy, County of Clearfield and State of
Pennsylvania, bounded on the East by
lands of Gwendolyn Jane Adcock, on the
South by the right-of-way of the
Pennsylvania Railroad, on the West by a
parcel of land, now, or formerly, owned by
Laurence and Millie Schriver, and on the
North by a section of the "old" Route 255
(macadam) used as an access road to the
property now, or formerly, of Louis and Mary
Ann Cimino.

ALSO DESCRIBED AS BEGINNING
at northeasterly corner of land now or
formerly of Joseph Berry at corner of land
and State Highway, thence along line of
State Highway northerly direction 200 feet
to a post, thence by lands of Younts, to a
post at the right of way of Pennsylvania
Railroad in an Easterly direction 150 feet;
thence along line of right-of-way of
Pennsylvania Railroad in a southerly
direction 200 feet to a post, thence in a
westerly direction along line of lands now or
formerly of Joseph Berry 175 feet to a post
at the place of beginning.

You have been sued in Court. The
purpose of this quiet title action is to
extinguish any right or equity which the
Defendants above named and their heirs,
administrators, executors and assigns may

have in the property as described above.
The Plaintiffs in this action, after a diligent
search, have been unable to locate the
Defendants or their devisees or heirs.

Whereupon the Court Ordered that
notice of said action be served on the
Defendants, and their heirs, administrators,
executors and assigns, by advertisement
requiring Defendants above-named and
their heirs, administrators, executors and
assigns to answer the Complaint within
twenty (20) days from the date of this
publication.

NOTICE

IF YOU WISH TO DEFEND, YOU
MUST ENTER A WRITTEN
APPEARANCE PERSONALLY OR BY
ATTORNEY TO FILE YOUR DEFENSE
OR OBJECTIONS IN WRITING WITH
THE COURT. YOU ARE WARNED
THAT IF YOU FAIL TO DO SO THE
CASE MAY PROCEED WITHOUT YOU
AND A JUDGMENT MAY BE ENTERED
AGAINST YOU WITHOUT FURTHER
NOTICE FOR THE RELIEF REQUESTED
BY THE PLAINTIFFS. YOU MAY LOSE
MONEY OR PROPERTY OR OTHER
RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS NOTICE
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
Courthouse, Second & Market Streets,
Clearfield, PA 16830 (814) 765-2641. (ext.
50-51)

Blakley, Jones & Mohney, 90 Beaver
Drive, Box 6 DuBois, PA 15801, (814) 371-
2730.

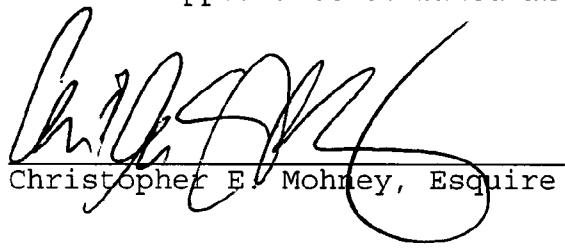
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW

GWENDOLYN JANE ADCOCK, : NO. 01 - 1636 - C.D.
: :
Plaintiff : :
: :
VS. : :
: :
SYLVAN RUSSELL CURRY and : :
MARIE CURRY, husband and : :
wife, and their heirs, : :
administrators, executors : :
and assigns, : :
: :
Defendants : :

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA : :
: : SS.
COUNTY OF CLEARFIELD : :

Personally appeared before me, CHRISTOPHER E. MOHNEY, ESQUIRE, a partner in the law firm of BLAKLEY, JONES & MOHNEY, who, being duly sworn according to law, deposes and says that the Complaint filed in the above-captioned action was served by publication once in The Courier-Express and once in the Clearfield County Legal Journal pursuant to Order of Court and that more than twenty (20) days have elapsed since publication and that the named Defendants or their representatives have not entered an appearance or filed an answer to the Complaint.



Christopher E. Mohney, Esquire

Sworn to and Subscribed before me

this 14th day of November 2001.

Kristin D. Dutry
Notary Public

Notarial Seal
Kristin D. Dutry, Notary Public
DuBois, Clearfield County
My Commission Expires June 30, 2003

EXHIBIT "C"

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW
NO. 01 - 1636 - C.D.

GWENDOLYN JANE ADCOCK,

Plaintiff

vs.

SYLVAN RUSSELL CURRY and
MARIE CURRY, husband and
wife, and their heirs,
administrators, executors
and assigns,

Defendants

MOTION FOR
DEFAULT JUDGMENT

LAW OFFICES
BLAKLEY, JONES & MOHNEY
90 BEAVER DRIVE - BOX 6
DUBOIS, PA 15801

FILED

NOV 15 2001
01:43 PM

William A. Shaw
Prothonotary
No. 110

ERK

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

GWENDOLYN JANE ADCOCK, : NO. 01 - 1636 - C.D.
Plaintiff : TYPE OF CASE: ACTION TO
VS. : QUIET TITLE
SYLVAN RUSSELL CURRY and : TYPE OF PLEADING: PRAECIPE FOR
MARIE CURRY, husband and : FINAL JUDGMENT FOR FAILURE TO
wife, and their heirs, : FILE EXCEPTIONS WITHIN THIRTY
administrators, executors : (30) DAYS OF COURT ORDER
and assigns, :
Defendants : FILED ON BEHALF OF:
: PLAINTIFF
: COUNSEL OF RECORD:
: CHRISTOPHER E. MOHNEY, ESQUIRE
: SUPREME COURT NO.: 63494
: BLAKLEY, JONES & MOHNEY
: 90 BEAVER DRIVE, BOX 6
: DU BOIS, PA 15801
: (814) 371-2730

FILED

DEC 20 2001
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William A. Shaw
Prothonotary



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

GWENDOLYN JANE ADCOCK, : NO. 01 - 1636 - C.D.
: Plaintiff :
: VS. :
: :
SYLVAN RUSSELL CURRY and :
MARIE CURRY, husband and :
wife, and their heirs, :
administrators, executors :
and assigns, :
: Defendants :

PRAECIPE FOR FINAL JUDGMENT FOR FAILURE
TO FILE EXCEPTIONS WITHIN THIRTY (30) DAYS OF
COURT ORDER

TO: WILLIAM A. SHAW, PROTHONOTARY

Please enter Judgment in favor of the Plaintiff and against the Defendants herein as per Order of Court dated the 16th day of November, 2001, in the above Quiet Title Action, the Defendants having failed to file exceptions to the said Order within thirty (30) days of the date of said Order.

BY:

BLAKLEY, JONES & MOHNEY
Christopher E. Mohney, Esquire
Attorneys for Plaintiff

IN THE COURT OF COMMON PLEAS OF
CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL ACTION - AT LAW
NO. 01 - 1636 - C.D.

GWENDOLYN JANE ADCOCK,

Plaintiff

vs.

SYLVAN RUSSELL CURRY and
MARIE CURRY, husband and
wife, and their heirs,
administrators, executors
and assigns,

Defendants

PRAECIPE FOR FINAL JUDGMENT FOR
FAILURE TO FILE EXCEPTIONS WITHIN
THIRTY (30) DAYS OF COURT ORDER

LAW OFFICES
BLAKLEY, JONES & MOHNEY
90 BEAVER DRIVE, BOX 6
DUBOIS, PA 15801