

01-1667-CD  
DANIEL BLOOM -vs- CLEARFIELD COUNTY TAX CLAIM BUREAU et al

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

**Sheriff Docket # 11634**

**BLOOM, DANIEL**

**01-1667-CD**

**VS.**  
**CLEARFIELD COUNTY TAX CLAIM BUREAU al**

**PETITION TO SET ASIDE TAX SALE & RULE**

**SHERIFF RETURNS**

---

**NOW OCTOBER 12, 2001 AT 8:40 AM DST SERVED THE WITHIN PETITION TO SET ASIDE TAX SALE & RULE ON CLEARFIELD COUNTY TAX CLAIM BUREAU, DEFENDANT AT EMPLOYMENT, COURTHOUSE ANNEX, 231 E. MARKET ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JEFFREY C. GRAHAM, ASST. TAX ADM. A TRUE AND ATTESTED COPY OF THE ORIGINAL PETITION & RULE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.**  
**SERVED BY: NEVLING.**

**NOW OCTOBER 12, 2001, THOMAS DEMKO, SHERIFF OF JEFFERSON COUNTY WAS DEPUTIZED BY CHESTER A. HAWKINS, SHERIFF OF CLEARFIELD COUNTY TO SERVE THE WITHIN PETITION TO SET ASIDE TAX SALE & RULE ON KIM MOWREY, DEFENDANT.**

**NOW OCTOBER 29, 2001 SERVED THE WITHIN PETITION TO SET ASIDE TAX SALE & RULE ON KIM MOWREY, DEFENDANT BY DEPUTIZING THE SHERIFF OF JEFFERSON COUNTY. THE RETURN OF SHERIFF DEMKO IS HERETO ATTACHED AND MADE A PART OF THIS RETURN.**

---

**Return Costs**

<b>Cost</b>	<b>Description</b>
<b>33.89</b>	<b>SHFF. HAWKINS PAID BY: ATTY.</b>
<b>35.50</b>	<b>SHFF. DEMKO PAID BY: ATTY.</b>
<b>20.00</b>	<b>SURCHARGE PAID BY: ATTY</b>

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 11634

BLOOM, DANIEL

01-1667-CD

VS.

CLEARFIELD COUNTY TAX CLAIM BUREAU a1

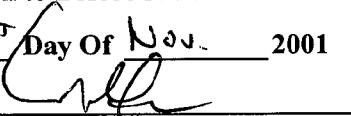
PETITION TO SET ASIDE TAX SALE & RULE

**SHERIFF RETURNS**

---

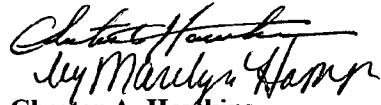
Sworn to Before Me This

21<sup>st</sup> Day Of Nov. 2001

  
WILLIAM A. SHAW  
Prothonotary

My Commission Expires  
1st Monday in Jan. 2002  
Clearfield Co. Clearfield, PA.

So Answers,

  
Chester A. Hawkins  
Sheriff

No. 91-1667-CD

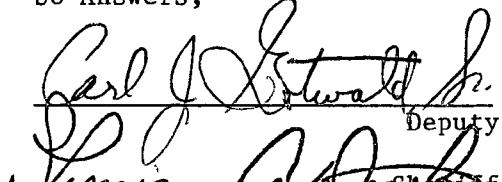
Personally appeared before me, Carl J. Gotwald, Sr., Deputy for Thomas A. Demko, Sheriff of Jefferson County, Pennsylvania, who according to law deposes and says that on October 29, 2001 at 10:40 o'clock A.M. served the Petition to Set Aside Tax Sale and Rule upon KIM MOWREY at her place of business, 362 North Park Street, Borough of Sykesville, County of Jefferson, State of Pennsylvania by handing to her, personally, a true copy of the Petition and Rule, and by making known to her the contents thereof.

Advance Costs Received:	\$ 125.00
My Costs:	\$ 33.50 Paid
Prothy:	\$ 2.00
Total Costs:	\$ 35.50
Refunded:	\$ 89.50

**Sworn and subscribed**  
to before me this 31st  
day of October, 2001  
By Thomas A. Demko

**PROTHONOTARY  
CLERK OF COURTS**  
My Commission Expires  
1st Monday of January 2002.  
Jefferson County, PA

So Answers,

  
Carl J. Gotwald, Sr.  
Deputy  
  
Thomas A. Demko  
SHERIFF  
JEFFERSON COUNTY, PENNSYLVANIA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DANIEL BLOOM,

CIVIL ACTION

Plaintiff/Petitioner

No. 01 - 1667 - CD

vs.

PETITION TO SET ASIDE TAX  
SALE

CLEARFIELD COUNTY TAX CLAIM  
BUREAU and KIM MOWREY,

Filed on behalf of:

Defendants/Respondents

Plaintiff/Petitioner,  
DANIEL BLOOM

Counsel of Record for Said  
Party:

JOSEPH COLAVECCHI, ESQUIRE  
PA I.D. 06810

COLAVECCHI RYAN & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

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

OCT 09 2001

Attest:

*William E. Colavecchi*  
Prothonotary

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

DANIEL BLOOM, :  
Plaintiff/Petitioner :  
vs. : No. 01 - - CD  
CLEARFIELD COUNTY TAX CLAIM :  
BUREAU and KIM MOWREY, :  
Defendants/Respondents :

R U L E

AND NOW, this 18<sup>th</sup> day of October, 2001, upon consideration of the foregoing Petition to Set Aside Tax Sale, a Rule is hereby issued upon Defendants/Respondents, to Show Cause why the Petition should not be granted.

Rule Returnable the 30<sup>th</sup> day of October, 2001, for written response.

A PETITION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PETITION BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO, THE CASE MAY PROCEED WITHOUT YOU AND AN ORDER MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE 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 AND MARKET STREETS  
CLEARFIELD, PENNSYLVANIA 16830  
814/765-2641 EXT. 5982

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

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

BY THE COURT:  
/S/ JOHN K. REILLY, JR.

JUDGE

OCT 10 2001

Attest: William Bloom  
Prothonotary

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

DANIEL BLOOM, :  
Plaintiff/Petitioner :  
:  
vs. : No. 01 - - CD  
:  
CLEARFIELD COUNTY TAX CLAIM :  
BUREAU and KIM MOWREY, :  
Defendants/Respondents :

PETITION TO SET ASIDE TAX SALE

1. Plaintiff/Petitioner is Daniel Bloom, residing at R.R. 1,  
Box 197, Curwensville, Pennsylvania, 16833.

2. Defendants/Respondents are:

(a) Clearfield County Tax Claim Bureau, having its office  
at the Clearfield County Courthouse Annex, 231 East Market Street,  
Clearfield, Pennsylvania, 16830.

(b) Kim Mowrey of 362 North Park Street, Sykesville,  
Pennsylvania, 15865.

3. Daniel Bloom is the owner of a 16.62 interest in a house  
and 94.77 acres situated in Bigler Township, Clearfield County,  
Pennsylvania, having been inherited by him under the Last Will of  
his deceased Uncle, Samuel E. Bloom, who passed away on July 25,  
1988.

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

4. The property is assessed to Daniel Bloom as a 16.6 interest in house and 94.77 acres situated in Bigler Township, Clearfield County, Pennsylvania, having Clearfield County Assessment Map Number 103-J15-000-0011.

5. Plaintiff/Petitioner has been paying the real estate taxes every year.

6. The property was listed for sale by the Clearfield County Tax Claim Bureau to be sold on September 14, 2001 for nonpayment of real estate taxes for the year 1999.

7. It is believed that this property was sold by the Clearfield County Tax Claim Bureau at the sale on September 14, 2001 to Kim Mowrey, 362 North Park Street, Sykesville, Pennsylvania, 15865.

8. The sale is defective for the following reasons:

a. Notice was not given to Plaintiff/Petitioner of the sale of this property as required under the Real Estate Tax Sale Law.

b. Any notices sent by the Tax Claim Bureau were sent to an incorrect address since they were not received by Plaintiff/Petitioner.

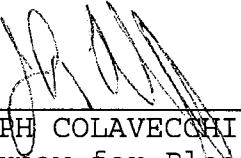
c. There is no signed return receipt of the certified mail which was directed to Plaintiff/Petitioner.

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

d. Plaintiff/Petitioner is entitled to notice of this sale in order to be sure that he has an opportunity to pay the real estate taxes.

WHEREFORE, Plaintiff/Petitioner asks that the sale of this property by the Clearfield County Tax Claim Bureau be set aside.

Respectfully submitted:



---

JOSEPH COLAVECCHI, ESQUIRE  
Attorney for Plaintiff/Petitioner

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DANIEL BLOOM,

CIVIL ACTION

Plaintiff/Petitioner

No. 01 - 1667 - CD

vs.

PETITION TO SET ASIDE TAX  
SALE

CLEARFIELD COUNTY TAX CLAIM  
BUREAU and KIM MOWREY,

Filed on behalf of:

Defendants/Respondents

Plaintiff/Petitioner,  
DANIEL BLOOM

Counsel of Record for Said  
Party:

JOSEPH COLAVECCHI, ESQUIRE  
PA I.D. 06810

COLAVECCHI RYAN & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

**FILED**

OCT 09 2001

William A. Shaw  
Prothonotary

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

DANIEL BLOOM, :  
Plaintiff/Petitioner :  
vs. : No. 01 - 1667 - CD  
CLEARFIELD COUNTY TAX CLAIM :  
BUREAU and KIM MOWREY, :  
Defendants/Respondents :

R U L E

AND NOW, this 16<sup>th</sup> day of October, 2001, upon consideration of the foregoing Petition to Set Aside Tax Sale, a Rule is hereby issued upon Defendants/Respondents, to Show Cause why the Petition should not be granted.

Rule Returnable the 30<sup>th</sup> day of October, 2001, for written response.

A PETITION HAS BEEN FILED AGAINST YOU IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PETITION BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE MATTER SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO, THE CASE MAY PROCEED WITHOUT YOU AND AN ORDER MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE 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 AND MARKET STREETS  
CLEARFIELD, PENNSYLVANIA 16830  
814/765-2641 EXT. 5982

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

FILED  
OCT 10 2001

William A. Shaw  
Prothonotary

BY THE COURT:

JUDGE

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

DANIEL BLOOM, :  
Plaintiff/Petitioner :  
:  
vs. : No. 01 - - CD  
:  
CLEARFIELD COUNTY TAX CLAIM :  
BUREAU and KIM MOWREY, :  
Defendants/Respondents :

PETITION TO SET ASIDE TAX SALE

1. Plaintiff/Petitioner is Daniel Bloom, residing at R.R. 1, Box 197, Curwensville, Pennsylvania, 16833.

2. Defendants/Respondents are:

(a) Clearfield County Tax Claim Bureau, having its office at the Clearfield County Courthouse Annex, 231 East Market Street, Clearfield, Pennsylvania, 16830.

(b) Kim Mowrey of 362 North Park Street, Sykesville, Pennsylvania, 15865.

3. Daniel Bloom is the owner of a 16.62 interest in a house and 94.77 acres situated in Bigler Township, Clearfield County, Pennsylvania, having been inherited by him under the Last Will of his deceased Uncle, Samuel E. Bloom, who passed away on July 25, 1988.

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

4. The property is assessed to Daniel Bloom as a 16.6 interest in house and 94.77 acres situated in Bigler Township, Clearfield County, Pennsylvania, having Clearfield County Assessment Map Number 103-J15-000-0011.

5. Plaintiff/Petitioner has been paying the real estate taxes every year.

6. The property was listed for sale by the Clearfield County Tax Claim Bureau to be sold on September 14, 2001 for nonpayment of real estate taxes for the year 1999.

7. It is believed that this property was sold by the Clearfield County Tax Claim Bureau at the sale on September 14, 2001 to Kim Mowrey, 362 North Park Street, Sykesville, Pennsylvania, 15865.

8. The sale is defective for the following reasons:

a. Notice was not given to Plaintiff/Petitioner of the sale of this property as required under the Real Estate Tax Sale Law.

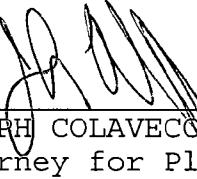
b. Any notices sent by the Tax Claim Bureau were sent to an incorrect address since they were not received by Plaintiff/Petitioner.

c. There is no signed return receipt of the certified mail which was directed to Plaintiff/Petitioner.

d. Plaintiff/Petitioner is entitled to notice of this sale in order to be sure that he has an opportunity to pay the real estate taxes.

WHEREFORE, Plaintiff/Petitioner asks that the sale of this property by the Clearfield County Tax Claim Bureau be set aside.

Respectfully submitted:



---

JOSEPH COLAVECCHI, ESQUIRE  
Attorney for Plaintiff/Petitioner

LAW OFFICES OF  
COLAVECCHI  
RYAN & COLAVECCHI  
221 E. MARKET ST.  
(ACROSS FROM  
COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA

*87*  
Lap over margin

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION  
No. 01-  
-CD

DANIEL BLOOM,  
PLAINTIFF/PETITIONER

vs.

CLEARFIELD COUNTY TAX CLAIM  
BUREAU and KIM MOWREY,  
DEFENDANTS/RESPONDENTS

PETITION TO SET ASIDE TAX  
SALE

**FILED**  
OCT 09 2001  
3cc shf

William A. Shaw  
Prothonotary  
16 fee

**COLAVECCHI**  
**RYAN & COLAVECCHI**

ATTORNEYS AT LAW  
221 EAST MARKET STREET  
(ACROSS FROM COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA 16830

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA

DANIEL BLOOM,

Plaintiff/Petitioner

vs.

CLEARFIELD COUNTY TAX CLAIM  
BUREAU and KIM MOWREY,

Defendants/Respondents

CIVIL ACTION

No. 01 - 1607 - CD

PRAECLYPE TO DISCONTINUE

Filed on behalf of:

Plaintiff/Petitioner,  
DANIEL BLOOM

Counsel of Record for Said  
Party:

JOSEPH COLAVECCHI, ESQUIRE  
PA I.D. 06810

COLAVECCHI RYAN & COLAVECCHI  
221 East Market Street  
P.O. Box 131  
Clearfield, PA 16830

814/765-1566

**FILED**

NOV 29 2001

William A. Shaw  
Prothonotary

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

DANIEL BLOOM, :  
Plaintiff/Petitioner :  
:  
vs. : No. 01 - 1608 - CD  
:  
CLEARFIELD COUNTY TAX CLAIM :  
BUREAU and KIM MOWREY, :  
Defendants/Respondents :

PRAECIPE TO DISCONTINUE

Please mark the records in the above captioned action discontinued, settled and ended, without prejudice.



JOSEPH COLAVECCHI, ESQUIRE  
Attorney for Plaintiff

—Lap over margin—

IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA  
CIVIL ACTION  
No. 01 - 1608 - CD

DANIEL BLOOM,

PLAINTIFF

vs.

CLEARFIELD COUNTY TAX CLAIM  
BUREAU and KIM MOWREY,

DEFENDANTS

PRAECLPICE TO DISCONTINUE

**FILED** NOV 29 2001

*Copy of Disc.*

*to Colavecchi, Kesner,*

William A. Shaw  
Prothonotary

*G. H. Tax office*

**COLAVECCHI**  
**RYAN & COLAVECCHI**

ATTORNEYS AT LAW  
221 EAST MARKET STREET  
(ACROSS FROM COURTHOUSE)  
P. O. BOX 131  
CLEARFIELD, PA 16830

**COPY**

**IN THE COURT OF COMMON PLEAS OF  
CLEARFIELD COUNTY, PENNSYLVANIA**

**CIVIL DIVISION**

**Daniel Bloom**

Plaintiff/Petitioner

**Vs.**

**No. 2001-01608-CD**

**Clearfield County Tax Claim Bureau**

**and Kim Mowrey**

Defendants/Respondents

**CERTIFICATE OF DISCONTINUATION**

Commonwealth of PA

County of Clearfield

I, William A. Shaw, Prothonotary of the Court of Common Pleas in and for the County and Commonwealth aforesaid do hereby certify that the above case was on November 29, 2001 marked:

Discontinued, Settled and Ended without Prejudice

No costs recorded in this action.

IN WITNESS WHEREOF, I have hereunto affixed my hand and seal of this Court at Clearfield, Clearfield County, Pennsylvania this 29th day of November A.D. 2001.

---

William A. Shaw, Prothonotary