

02-571-CD
RAYMOND A. SMITH et ux -vs- L. E. DOTTES et al

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

RAYMOND A. SMITH and SHIRLEY B. :
SMITH, his wife, :
Plaintiffs :
No. 02-571-CO
vs. :
: ACTION TO QUIET TITLE
L. E. DOTT, HANNAH LOCHRIE, :
THOMAS LOCHRIE, ARTHUR BROS., and :
REBECCA J. ARTHUR, their heirs :
executors, administrators and :
assigns, :
Defendants :
:

Filed on behalf of
Plaintiffs

Counsel of Record for
this Party:

Carl A. Belin, Jr.
Attorney-at-Law
Pa. I.D. 06805

Belin & Kubista
15 North Front Street
P.O. Box 1
Clearfield, PA 16830

(814) 765-8972

FILED

APR 11 2002

William A. Shaw
Prothonotary

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

RAYMOND A. SMITH and SHIRLEY B.	:	
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REBECCA J. ARTHUR, their heirs	:	
executors, administrators and	:	
assigns,	:	
Defendants	:	

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the 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 Courthouse
1 North Second Street
Clearfield, PA 16830

(814) 765-2641 Ex 5982

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

RAYMOND A. SMITH and SHIRLEY B.	:	
SMITH, his wife,	:	
Plaintiffs	:	
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L. E. DOTTs, HANNAH LOCHRIE,	:	ACTION TO QUIET TITLE
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REBECCA J. ARTHUR, their heirs	:	
executors, administrators and	:	
assigns,	:	
Defendants	:	

COMPLAINT

NOW COMES, the Plaintiffs, and by and through their attorneys Belin & Kubista, bring the following action in quiet title, and in support thereof, allege as follows:

1. That the Plaintiffs are Raymond A. Smith and Shirley B. Smith, his wife, of Winslow Township, Jefferson County, Pennsylvania, with a mailing address of P.O. Box 39, Reynoldsville, Pennsylvania 15851.

2. The Defendants are: L. E. Dotts, whose last known address is Glen Hope, Clearfield County, Pennsylvania; Hannah Lochrie, whose last known address is the Borough of Windber, Somerset County, Pennsylvania; Thomas Lochrie, who last known address is the Borough of Windber, Somerset County,

Pennsylvania; Arthur Bros., whose last known address is the City of Philadelphia, Pennsylvania; and Rebecca J. Arthur, whose last known address is Radnor Township, Delaware County, Pennsylvania.

3. That the Plaintiffs are the owners of a tract of land identified in the Clearfield County Tax Maps as Parcel Number 8-I15-13, which is located in Glen Hope Borough, Clearfield County, Clearfield Pennsylvania, more particularly bounded and described as follows:

BEGINNING at a post by land of Joshua Comstock; thence North thirty-three (33°) degrees West twelve (12) perches to a hemlock; thence North seventy-five (75°) degrees West sixty-two (62) perches to a hemlock; thence North forty-seven (47°) degrees West thirty-one (31) perches to a hemlock; thence North twenty-three (23°) degrees West thirty-eight (38) perches to a hemlock; thence South fifty-two (52°) degrees West twenty-eight (28) perches to post in Blue Run; thence down said Run South twenty-five (25°) degrees East forty (40) perches to a post; thence South forty-five (45°) degrees East twenty-eight (28) perches to post; thence South sixty (60°) degrees East, sixty-five (65) perches to a post; thence South eighty-one (81°) degrees East six (6) perches to a post in Run; thence North seven (7°) degrees East twenty-one (21) perches to post; thence South

eighty-one (81) degrees East twenty-one (21) perches to post; thence North seven (7°) degrees East two and one-fourth (2-1/4) perches to a post; thence North eighty-one (81°) degrees East ten (10) perches to place of beginning.

CONTAINING twenty-three (23) acres and eighteen (18) perches.

4. That Raymond A. Smith and Shirley B. Smith acquired the other one-half (1/2) interest in the premises by deed of R. Wesley Smith and Samantha Smith by deed dated April 24, 1998, and recorded in the Clearfield County Recorder of Deeds Office in Deeds and Record Book 1926, page 340.

5. That Raymond A. Smith and Shirley B. Smith, husband and wife, and R. Wesley Smith and Samantha L. Smith, husband and wife, Plaintiffs herein, each acquired a one-half interest in the premises by deed of James R. Walsh, Trustee of the Bankruptcy Estate of Benjamin Coal Company dated April 11, 1992, recorded in the Office of the Recorder of Deeds of Clearfield County in Deeds and Records Book 1465, page 377.

6. That Benjamin Coal Company acquired the premises by deed of Stanley A. Garson and Margaret J. Garson dated September 9, 1977, recorded in the Office of the Recorder of Deeds in Deed Book 746, page 13.

7. That Stanley A. Garson and Margaret J. Garson acquired the premises by deed of Mark K. Bowles and Donna Bowles dated February 2, 1966, recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 345, page 325.

8. The Mark Bowles and Donna Bowles acquired the premises by deed of the Clearfield County Commissioners as 33 acres assessed in the name of L. E. Dotts on October 5, 1964, but the said Commissioners' deed was not recorded.

9. That the Clearfield County Commissioners acquired the premises by deed of Clearfield County Treasurer as 33 acres of surface assessed in the name of L. E. Dotts on August 3, 1943, for unpaid taxes, but said Treasurer's deed was not recorded.

10. That one of the purposes of this quiet title action is to extinguish any interest that L. E. Dotts, his heirs and assigns, may have had in and to said premises due to lack of notice or any other defect in the tax sale referred to in Paragraphs 8 and 9, and to extinguish any interest or equity that L. E. Dotts may have had in the premises following said tax sale, and further to extinguish any interest or equity in any

party resulting from the failure to record the Treasurer's deed and Commissioners' deed as to said tax sale.

11. That L. E. Dotts acquired the premises by deed of the Clearfield County Commissioners as 33 acres assessed in the name of Hannah Lochrie on April 24, 1950, but said Commissioners' deed was not recorded.

12. That Clearfield County Commissioners acquired the premises by deed of the Clearfield County Treasurer as 33 acres assessed in the name of Hannah Lochrie, on August 24, 1947, but said Treasurer's deed was not recorded.

13. That one of the purposes of this quiet title action is to extinguish any interest that Hannah Lochrie, her heirs and assigns, may have had in and to said premises due to lack of notice or any other defect in the tax sale referred to in Paragraphs 11 and 12, and to extinguish any interest or equity that Hannah Lochrie may have had in the premises following said tax sale, and further to extinguish any interest or equity in any party resulting from the failure to record the Treasurer's deed or Commissioners' deed as to said tax sale.

14. That the premises were transferred from Thomas Lochrie to Hannah Lochrie for the assessment of 33 acres for the

year of 1941 but that there is no deed or other instrument of transfer recorded in Clearfield County to support said transfer.

15. That one of the purposes of this quiet title action is to extinguish any interest Thomas Lochrie, his heirs, personal representatives or assigns may have had in and to the premises as a result of the transfer of said assessment and to extinguish any interest or equity that Thomas Lochrie may have had in the premises following the transfer of said assessment in Hannah Lochrie's name.

16. That the premises were acquired by the Clearfield County Commissioners by deed of the Clearfield County Treasurers as 33 acres assessed in the name of Arthur Bros. dated August 10, 1931, but the Treasurer's deed was not recorded.

17. That the premises were acquired by Thomas Lochrie by deed of the Clearfield County Commissioners as 33 acres assessed in the name of Arthur Bros. dated November 17, 1936, but the Commissioners' deed was not recorded.

18. That one of the purposes of this quiet title action is to extinguish any interest that Arthur Bros., its successors and assigns, may have had in and to said premises due to lack of notice or any other defect in the tax sale referred

to in Paragraphs 16 and 17, and to extinguish any interest or equity that Arthur Bros. may have had in the premises following said tax sale, and further to extinguish any interest or equity in any party resulting from the failure to record the Treasurer's deed and Commissioners' deed as to said tax sale.

19. That Thomas Lochrie acquired the premises by deed of George Wild, Georgia Wild, his wife, and John E. Reese dated November 1, 1922, and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 262, page 49.

20. That George Wild and John E. Reese acquired the premises by deed of Lydia E. Julian, Catherine W. Arthur, Christina G. Cree and Henry B. Cree, her husband, and the heirs of Rebecca J. Arthur: J. Warren Arthur, Janet B. Arthur, widow of Charles H. Arthur, Margaret W. Arthur, Fannie R. Arthur, Meredith H. Parsons and Sarah Ester, his wife, Isaac W. W. Parsons and Dorothy V., his wife, Charles A. Parsons and Sidney Kerr, his wife, and Edwin A. Parsons and Winnie, his wife, dated October 30, 1922, and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 262, page 52.

21. That there is no estate found or recorded in Clearfield County for Rebecca J. Arthur.

22. That one of the purposes of this quiet title action is to extinguish any interest that Rebecca J. Arthur, her heirs, administrators, or assigns, may have had in the premises and to extinguish any interest or equity that Rebecca J. Arthur, her heirs, personal representatives or assigns may have had in the premises following the execution of the deed by the purported heirs to George Wild and John E. Reese.

23. That Lydia E. Julian, Katharine W. Arthur, and Christiana G. Cree acquired a one-half interest being the interest of Robert M. Arthur in the premises by deed of Lydia C. Arthur dated June 19, 1913, and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 199, page 420.

24. That Lydia C. Arthur acquired a one-half interest in the premises as devisee of the Last Will and Testament of Robert M. Arthur who died on December 6, 1907, and whose Last Will and Testament is filed in the Register of Wills Office in Clearfield County in Will Book G, page 444.

25. That C. J. Arthur and Robert M. Arthur acquired the premises by deed of Joshua Comstock and Hope Comstock, his wife, by deed dated June 23, 1870 and recorded in the Office of

the Recorder of Deeds of Clearfield County in Deed Book GG, page 73.

26. That C. J. Arthur died on June 13, 1877, intestate and Rebecca J. Arthur, J. Warren Arthur and Jacob L. Warner were appointed administrators of his estate as found in the estate filed of record in the Clearfield County Register of Wills at File Number 1387.

27. That C. Anderson Warner acquired a one-half interest in the premises being the interest of C. J. Arthur by deed of Rebecca J. Arthur, Jacob L. Warner and J. Warner Arthur, Administrators of the Charles J. Arthur Estate dated July 15, 1884, and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 44, page 28.

28. That Rebecca J. Arthur acquired a one-half interest in the premises being the interest of C. J. Arthur by deed of C. Anderson Warner, and Anna C. his wife, dated January 27, 1893 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 119, page 482.

29. That the Plaintiffs and their predecessors in title have exercised adverse, continuous, visible, notorious,

exclusive and hostile possession over the premises and have continued possession for a period in excess of 21 years.

30. That the Defendants and the Plaintiffs herein are the only persons known to the Plaintiffs who have any interest in the said premises.

WHEREFORE, Plaintiffs request:

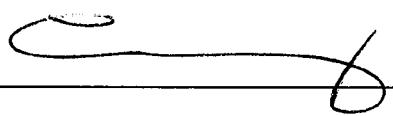
(a) That by decree of Your Honorable Court it may be declared that the Plaintiffs have acquired title to the premises and that they should be allowed to enjoy said properties in peace;

(b) That the Defendants within twenty (20) days from the receipt of the Complaint, institute an action of ejectment against the Plaintiffs and that otherwise the Defendants be perpetually enjoined from setting up any title to said premises; from impeaching, denying or in any way attacking the Plaintiffs' title to said premises, from issuing or maintaining an ejectment of said premises or any part thereof; and

(c) Such other relief as the court deems proper.

Respectfully Submitted,

BELIN & KUBISTA

By 

Carl A. Belin, Jr., Esq.

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

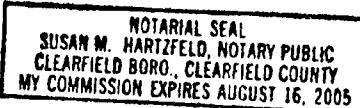
Before me the undersigned officer, personally appeared R. RAYMOND A. SMITH and SHIRLEY B. SMITH, his wife, who being duly sworn according to law, depose and say that the facts set forth in the foregoing Complaint are true and correct to the best of their knowledge, information and belief.

Raymond A. Smith
Raymond A. Smith

Shirley B. Smith
Shirley B. Smith

Sworn and subscribed before me this 11th day of
April, 2002.

Susan M. Hartzfeld
Notary Public



CLEARFIELD, PENNSYLVANIA 16830
P. O. BOX 1
15 NORTH FRONT STREET
ATTORNEYS AT LAW
BELLIN & KUBISTA

FILED

APR 11 2002
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William A. Shaw pd \$90.00
Prothonotary
cc: 3cc atty Bellin
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Defendants :

Filed on behalf of
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Counsel of Record for
this Party:

Carl A. Belin, Jr.
Attorney-at-Law
Pa. I.D. 06805

Belin & Kubista
15 North Front Street
P.O. Box 1
Clearfield, PA 16830

(814) 765-8972

FILED

APR 11 2002
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William A. Shaw KPA
Prothonotary

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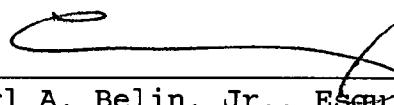
AFFIDAVIT

Carl A. Belin, Jr., Esquire, being duly sworn according to law, deposes and states that he is the attorney for the Plaintiff and that he attempted to ascertain the identity, whereabouts, and addresses of Defendants L. E. Dotts, Hannah Lochrie, Thomas Lochrie, Arthur Bros., and Rebecca J. Arthur, their heirs, executors, administrators, and assigns.

He further avers that he caused an abstractor to search the real estate and estate records of Clearfield County and that no listings in the name of Defendants L. E. Dotts, Hannah Lochrie, Thomas Lochrie, Arthur Bros., and Rebecca J. Arthur, their heirs, executors, administrators and assigns were found; that phone

directories were consulted in Windber, Pennsylvania, Philadelphia, Pennsylvania, Radnor Township, Delaware County, Pennsylvania and no listings were found for L. E. Dotts, Hannah Lochrie, Thomas Lochrie, Arthur Bros., and Rebecca J. Arthur, their heirs, executors, administrators and assigns; that the city directories, the tax records, or the indices in the Somerset County Recorder of Deeds Office were searched and no addresses or recent transactions in the name of Hannah Lochrie and Thomas Lochrie, their heirs, executors, administrators and assigns were found; that the city directories, the tax records, or the indices in the Philadelphia County Recorder of Deeds Office were searched and no addresses or recent transactions in the name of Arthur Bros., its administrators and assigns were found; that the city directories, the tax records or the indices in the Delaware County Recorder of Deeds Office were searched and no addresses or recent transactions in the name of Rebecca J. Arthur were found.

Based upon the foregoing search, personal service cannot be made upon and it is necessary that service be made by publication.



Carl A. Belin, Jr., Esquire
Attorney for Plaintiffs

Sworn and subscribed before me this 11th day of
April, 2002.

Susan M. Hartzfeld
Notary Public



CLEARFIELD, PENNSYLVANIA 16830

P.O. BOX 1

10 NORTH TRAIL, CLEARFIELD

ATTORNEYS AT LAW

BEILIN & KUBISTA

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

RAYMOND A. SMITH and SHIRLEY B. :
SMITH, his wife, :
Plaintiffs :
vs. : No. 02-571-CO
: ACTION TO QUIET TITLE
L. E. Dotts, Hannah Lochrie, :
Thomas Lochrie, Arthur Bros., and : MOTION FOR PUBLICATION
Rebecca J. Arthur, their heirs :
executors, administrators and :
assigns, :
Defendants :

Filed on behalf of
Plaintiffs

Counsel of Record for
This Party:
Carl A. Belin, Jr., Esq.
Pa. I.D. #06805

BELIN & KUBISTA
15 North Front Street
P.O. Box 1
Clearfield, PA 16830

(814) 765-8972

FILED

APR 11 2002

02-571-CO
William A. Shaw *RS*
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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Thomas Lochrie, Arthur Bros., and	:	
Rebecca J. Arthur, their heirs	:	
executors, administrators and	:	
assigns,	:	
	Defendants	:

MOTION FOR PUBLICATION

AND NOW, to wit: April 11, 2002, an affidavit having been executed and filed on behalf of the Plaintiffs that the Defendants L. E. Dotts, Hannah Lochrie, Thomas Lochrie, Arthur Bros., and Rebecca J. Arthur, their heirs, executors, administrators, and assigns, present whereabouts are unknown, that Plaintiffs, by their attorneys, Belin & Kubista, move the Court for leave to serve the complaint on Defendants L. E. Dotts, Hannah Lochrie, Thomas Lochrie, Arthur Bros., and Rebecca J. Arthur, their heirs, executors and assigns, by publication in *The Progress* and the *Clearfield County Legal Journal*, Clearfield, Pennsylvania one (1) time.

BELIN & KUBISTA

Carl A. Belin, Jr., Esquire

CLEARFIELD, PENNSYLVANIA 16830
P. O. BOX 1
15 NORTH IRONI STREET
ATTORNEYS AT LAW
BELIN & KUBISTA

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

RAYMOND A. SMITH and SHIRLEY B. :
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THOMAS LOCHRIE, ARTHUR BROS., and :
REBECCA J. ARTHUR, their heirs :
executors, administrators and :
assigns, :
Defendants :

ORDER

AND NOW, to wit: this 12th day of April, 2002,
upon consideration of the foregoing Motion, the Plaintiffs are
granted leave to make service of the Complaint on the Defendants,
L. E. Dotts, Hannah Lochrie, Thomas Lochrie, Arthur Bros., and
Rebecca J. Arthur, their heirs, executors, administrators and
assigns by general publication one time in *The Progress* and the
Clearfield County Legal Journal, Clearfield, Pennsylvania not less
than thirty (30) days prior to June 13, 2002, the date set
for hearing of said Complaint in the Courtroom at Clearfield,

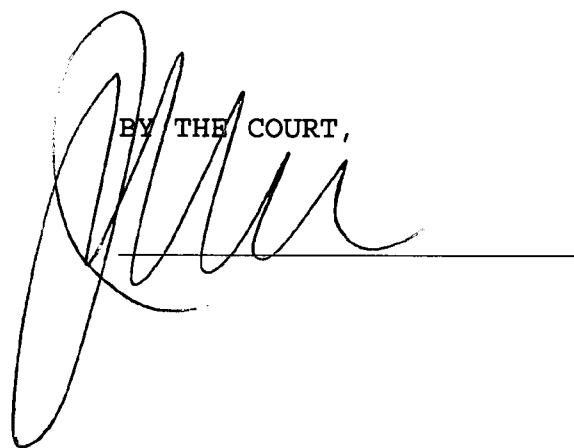
FILED

APR 12 2002

04/12/02
William A. Shaw
Prothonotary

Pennsylvania at 1:30 o'clock P.m.

BY THE COURT,



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

RAYMOND A. SMITH and SHIRLEY B. :
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Plaintiffs :
: : No. 02 - 571 - C.D.
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THOMAS LOCHRIE, ARTHUR BROS., and : AFFIDAVIT
REBECCA J. ARTHUR, their heirs :
executors, administrators and :
assigns, :
Defendants :
:

Filed on behalf of
Plaintiffs

Counsel of Record for
this Party:

Carl A. Belin, Jr., Esq.
Pa. I.D. #08605

BELIN & KUBISTA
15 North Front Street
P.O. Box 1
Clearfield, PA 16830
(814) 765-8972

FILED

MAY 22 2002
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William A. Shaw
Prothonotary

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

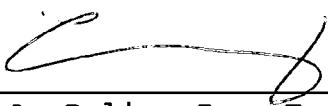
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L. E. Dotts, Hannah Lochrie, :
Thomas Lochrie, Arthur Bros., and :
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assigns, :
Defendants :

AFFIDAVIT OF SERVICE

COMMONWEALTH OF PENNSYLVANIA :
: SS.
COUNTY OF CLEARFIELD :

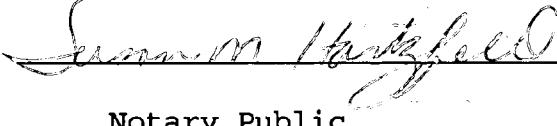
CARL A. BELIN, JR., attorney for the above named Plaintiffs,
being duly sworn according to law, deposes and states that Notice
of the Quiet Title Action was served upon Defendants, L. E. Dotts,
Hannah Lochrie, Thomas Lochrie, Arthur Bros., and Rebecca J.
Arthur, their heirs, executors, administrators, and assigns, by
publication in *The Progress* a newspaper on April 16, 2002, as
evidenced by the Proof of Publication dated May 20, 2002, attached
hereto AND by publication in the *Clearfield County Legal Journal*,
Clearfield, on April 19, 2002, as evidenced by the Proof of

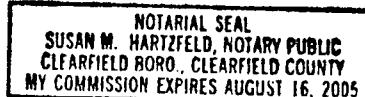
Publication dated May 1, 2002, attached hereto.


Carl A. Belin, Jr., Esquire

SWORN AND SUBSCRIBED before me this 1st day of

May, 2002.


Susan M. Hartzfeld
Notary Public

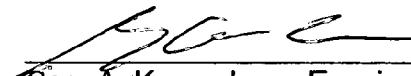


PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : :

COUNTY OF CLEARFIELD : :

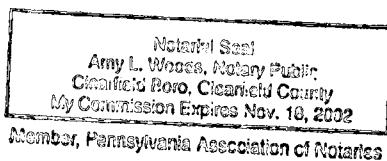
On this 1st day of May AD 2002, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Gary A. Knaresboro editor of the Clearfield County Legal Journal of the Courts of Clearfield County, and that the annexed is a true copy of the notice or advertisement published in said publication in the regular issues of Week of April 19, 2002, Vol. 14 No. 16. 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.

Amy L. Woods
Notary Public
My Commission Expires



Belin & Kubista
PO Box 1
Clearfield, PA 16830

LARGE LOCAL residential contractor is looking for an experienced warranty service person and also experienced framing sub-contractors. Bellefonte 355-2325, ext. 130.

LOOKING for the right cashier and/or cook in a very busy, fast paced store. Part-time or full-time. Must be energized and have people person skills. For details, call Dave at Gio's before 5:00 P.M., Monday thru Friday, Woodland 857-7714.

LOOKING FOR WAITER/waitress and delivery person. Apply in person at Spanky's Court House Cafe, 14 North 2nd Street, Clearfield.

LPN'S NEEDED. Offering competitive wage and benefit package. Send resume to Box "2276", c/o The Progress, P.O. Box 291, Clearfield, PA 16830.

M A I N T E N A N C E TECHNICIAN: State College apartment community seeking full-time maintenance technician to perform plumbing, electrical and general maintenance duties. Great benefits available. Please send resume and salary history to: Box "2293" c/o The Progress, 109 North Front Street, Philipsburg, PA 16866.

MANAGEMENT OPPORTUNITY. Career Opportunity with Major Company. Complete training program, excellent benefits. Call Clearfield 814-765-8752 for a confidential interview.

MATERIALS HANDLER: Builders Surplus of Bigler needs a Material Handler to perform heavy work such as unloading trucks, moving stock, and assisting customers in loading purchases. This is a part-time position. Please send a resume to or complete an application at: Builders Surplus, P.O. Box 307, US Route 322, Bigler, PA 16825. An Equal Opportunity Employer.

MRI TECH and CT TECH for Imaging Center. Excellent pay and benefits. Call 800-624-6110 or fax resume to 611 Open MRI & CT, Attention: Tom Mueller, 814-867-5285.

MUST BE willing to travel with concessions. Neat, reliable. Phone 857-7759.

PART-TIME help for seasonal greenhouse work on Route 879 near Sheetz. Apply to Helen Liegey, Clearfield 765-7673.

PERSON TO CLEAN. Apply in person at Snow Shoe Exit 22 Restaurant.

RECEPTIONIST/BILLING CLERK: Part-time employment for multi-task chiropractic office. Must enjoy working with people. Send resume: Box "2296" c/o The Progress, 109 North Front Street, Philipsburg, PA 16866.

RETIREE LOOKING for housekeeper. Please reply to Box "2294", c/o

to the following
in Glen Hope Borough,
Clearfield County, Pennsylvania,
more particularly
bounded and described as follows:

BEGINNING at a post by land of
Joshua Comstock; thence North
thirty-three (33°) degrees West
twelve (12) perches to a hemlock;
thence North seventy-five (75°)
degrees West sixty-two (62)
perches to a hemlock; thence
North forty-seven (47°) degrees
West thirty-one (31) perches to a
hemlock; thence North twenty-
three (23°) degrees West thirty-
eight (38) perches to a hemlock;
thence South fifty-two (52°) de-
grees West twenty-eight (28)
perches to post in Blue Run; thence
down said Run South twenty-five
(25°) degrees East forty (40)
perches to a post; thence South
forty-five (45°) degrees East
twenty-eight (28) perches to post;
thence South sixty (60°) degrees
East, sixty-five (65) perches to a
post; thence South eighty-one
(81°) degrees East six (6) perches
to a post in Run; thence North sev-
en (7°) degrees East twenty-one
(21) perches to post; thence South
eighty-one (81°) degrees East
twenty-one (21) perches to post;
thence North seven (7°) degrees
East two and one-fourth (2-1/4)
perches to a post; thence North
eighty-one (81°) degrees East ten
(10) perches to place of beginning.
CONTAINING twenty-three (23)
acres and eighteen (18) perches.

That the purpose of this Quiet Title
Action include the following; to ex-
tinguish any interest that L. E.
Dotts, his heirs and assigns, may
have had in and to the premises due
to any lack of notice or any other de-
fect of the Treasurer's sale of Au-
gust 3, 1943, and the
Commissioner's sale on October 5,
1964 referred to in Paragraphs 8
and 9 of the Complaint which are
hereby incorporated by reference
and made a part hereof, and to ex-
tinguish any interest or equity that
L. E. Dotts may have had in the
premises following said tax sale,
and further to extinguish any inter-
est in the premises in any party as a
result of the failure of Mark Bowles
and Donna Bowles to record the
treasurer's and the
commissioner's deed; to extin-
guish any interest that Hannah Lo-
chrie may have had in the premises
due to any lack of Notice or any other
defect of the Treasurer's sale of
April 24, 1950 and the
Commissioner's sale on August
24, 1947 referred to in Paragraphs
11 and 12 of the Complaint which
are hereby incorporated by refer-
ence and made a part hereof, and to
extinguish any interest or equity
Hannah Lochrie may have had in
the premises following said tax sale,
and further to extinguish any
interest in the premises in any party
as a result of the failure of L. E. Dotts
to record the treasurer's and the
commissioner's deed; to extin-
guish any interest that Thomas Lo-
chrie, his heirs, personal represen-
tatives or assigns may have had in
the premises as a result of the trans-
fer of the assessment of 33 acres
for the year of 1941 to Hannah Lo-
chrie referred to in Paragraph 14 of
the Complaint which is hereby in-
corporated by reference and made
a part thereof, and further to extin-
guish any interest or equity that
Thomas Lochrie may have had in
the premises following the transfer
of said assessment; to extinguish
any interest Arthur Bros. may have
had in the premises due to any lack
of notice or any other defect of the
Treasurer's sale on August 10,
1931 and the Commissioner's sale
on November 17, 1936 referred to
Paragraphs 16 and 17 of the Com-
plaint which are hereby incor-
porated by reference and made a
part hereof, and to extinguish any
interest or equity Arthur Bros. may
have had in the premises following
said tax sale, and further to extin-
guish any interest in the premises in
any party as a result of the failure of
Thomas Lochrie to record the
treasurer's and the
commissioner's deed; to extin-
guish any interest that Rebecca J.
Arthur, her heirs, administrators, or
assigns may have had in the prem-
ises following the execution of the
deed by the purported heirs to
George Wild and John E. Reese re-
ferred to in Paragraph 20 of the
Complaint which is hereby incor-
porated by reference and made a
part hereof, and to extinguish any
interest or equity that Rebecca J.
Arthur, her heirs, personal represen-
tatives or assigns may have had
in the premises following the ex-
ecution of said deed.

WHEREUPON said Court or-
dered that notice of said action and
the facts thereto be served on the
Defendants L. E. Dotts, Hannah Lo-
chrie, Thomas Lochrie, Arthur Bros.,
and Rebecca J. Arthur, their
heirs, executors, administrators
and assigns, by the Plaintiffs by ad-
vertisement requiring Defendants
L. E. Dotts, Hannah Lochrie, Tho-
mas Lochrie, Arthur Bros., and Re-
becca J. Arthur, their heirs, execu-
tors, administrators and assigns, to
answer the said complaint within
twenty (20) days from the date of
this publication. For failure to com-
ply, a judgment will be taken by ap-
plication of Plaintiffs before the
Court at a hearing to be held on
June 13, 2002, at 1:30 P.M., at
the Clearfield County Courthouse,
Clearfield, Pennsylvania.

BELIN & KUBISTA, Attorneys at
Law, 15 North Front Street, Clear-
field, Pennsylvania, Attorneys for
Plaintiff.

IN THE COURT
OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA
CIVIL DIVISION
No. 02-571-CD
ACTION TO
QUIET TITLE
RAYMOND A. SMITH and SHIRLEY B. SMITH, his wife, Plaintiffs
vs.

L. E. DOTT, HANNAH LOCHRIE, THOMAS LOCHRIE, ARTHUR BROS., and REBECCA J. ARTHUR, their heirs, executors,

administrators and assigns, Defendants

TO: L. E. DOTT, HANNAH LOCHRIE, THOMAS LOCHRIE, ARTHUR BROS., and REBECCA J. ARTHUR, THEIR HEIRS, EXECUTORS, ADMINISTRATORS AND ASSIGNS:

NOTICE

If you wish to defend, you must enter a written appearance personally or by attorney and file your defenses or objections in writing with the court. You 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. 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.

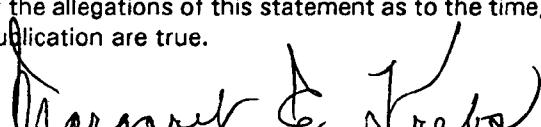
Court Administrator, Clearfield County Courthouse, 1 North Second Street, Clearfield, Pennsylvania (814) 765-2641 Ext.

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :
: SS:
COUNTY OF CLEARFIELD :

On this 20th day of May, A.D. 2002, before me, the subscriber, a Notary Public in and for said County and State, personally appeared Margaret E. Krebs, who being duly sworn according to law, deposes and says that she is the President of The Progressive Publishing Company, Inc., and Associate Publisher of The Progress, a daily newspaper published at Clearfield, in the County of Clearfield and State of Pennsylvania, and established April 5, 1913, and that the annexed is a true copy of a notice or advertisement published in said publication in

the regular issues of April 16, 2002. And that the affiant is not interested in the subject matter of the notice or advertising, and that all of the allegations of this statement as to the time, place, and character of publication are true.


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


Ann K. Law
Notary Public

Clearfield, Pa.

My Commission Expires
September 16, 2004

Notarial Seal
Ann K. Law, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Sept. 16, 2004
Member, Pennsylvania Association of Notaries

CLEARFIELD, PENNSYLVANIA 16830
P. O. BOX 1
15 NOKOMIS FRONT STREET
ATTORNEYS AT LAW
BELIN & KUBISTA

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

RAYMOND A. SMITH and SHIRLEY B. SMITH, his wife, Plaintiffs vs. L. E. DOTTS, HANNAH LOCHRIE, THOMAS LOCHRIE, ARTHUR BROS., and REBECCA J. ARTHUR, their heirs, executors, administrators and assigns, Defendants.

No. 02-571-CD

ACTION TO QUIET TITLE

TO: L. E. DOTTS, HANNAH LOCHRIE, THOMAS LOCHRIE, ARTHUR BROS., and REBECCA J. ARTHUR, their heirs, executors, administrators and assigns:

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. 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, 1 North Second Street, Clearfield, PA 16830. (814) 765-2641 Ex. 5982.

You are hereby notified that an Action to Quiet Title to the following premises situate in Glen Hope Borough, Clearfield County, Pennsylvania, more particularly bounded and described as follows:

BEGINNING at a point by land of Joshua Comstock; thence North thirty-three (33) degrees West twelve (12) perches to a hemlock; thence North seventy-five (75) degrees West sixty-two (62) perches to a hemlock; thence North forty-seven (47) degrees West thirty-one (31) perches to a hemlock; thence North twenty-three (23) degrees West thirty-eight (38) perches to a hemlock; thence South fifty-two (52) degrees West twenty-eight (28) perches to post in Blue Run; thence down said Run South twenty-five (25) degrees East forty (40) perches to a post; thence South forty-five (45) degrees East twenty-eight (28) perches to post; thence South sixty (60) degrees East, sixty-five (65) perches to a post; thence South eighty-one (81) degrees East twenty-one (21) perches to post;

thence North seven (7) degrees East two and one-fourth (2 1/4) perches to a post; thence North eighty-one (81) degrees East ten (10) perches to place of beginning.

CONTAINING twenty-three (23) acres and eighteen (18) perches.

That the purposes of this Quiet Title Action include the following: to extinguish any interest that L. E. Dotts, his heirs and assigns, may have had in the premises due to any lack of notice or any other defect of the Treasurer's sale of August 3, 1943, and the Commissioner's sale on October 5, 1964 referred to in Paragraphs 8 and 9 of the Complaint which are hereby incorporated by reference and made a part hereof, and to extinguish any interest or equity that L. E. Dotts may have had in the premises following said tax sale, and further to extinguish in the premises in any party as a result of the failure of Mark Bowles and Donna Bowles to record the treasurer's and the commissioner's deed; to extinguish any interest that Hannah Lochrie may have had in the premises due to any lack of notice or any other defect of the Treasurer's sale of April 24, 1950 and the Commissioner's sale on August 24, 1947 referred to in Paragraphs 11 and 12 of the Complaint which are hereby incorporated by reference and made a part hereof, and to extinguish any interest or equity Hannah Lochrie may have had in the premises following said tax sale, and further to extinguish any interest in the premises in any party as a result of the failure of L. E. Dotts to record the Treasurer's and the commissioner's deed; to extinguish any interest that Thomas Lochrie, his heirs, personal representatives or assigns may have had in the premises as a result of the transfer of the assessment of 33 acres for the year of 1941 to Hannah Lochrie referred to in Paragraph 14 of the Complaint which is hereby incorporated by reference and made a part hereof, and further to extinguish any interest or equity that Thomas Lochrie may have had in the premises following the transfer of said assessment; to extinguish any interest Arthur Bros. May have had in the premises due to any lack of notice or any other defect of the Treasurer's sale on August 10, 1931 and the Commissioner's sale on November 17, 1936 referred to Paragraphs 16 and 17 of the Complaint which are herein incorporated by reference and made a part hereof, and to extinguish any interest or equity Arthur Bros. May have had in the premises following said tax sale, and further to extinguish any interest in the premises in any party as a result of the failure of Thomas Lochrie to record the Treasurer's and the commissioner's deed; to extinguish any interest that Rebecca J. Arthur, her heirs, administrators, or assigns may have had in the premises following the execution of the deed by the purported heirs to

GARRISON, MARIAN A., Dec'd
Late of Clearfield
Executor: **CLEARFIELD BANK
& TRUST CO.**
Attorney: **MICHAEL P. YEAGER**
P.O. Box 752
Clearfield, PA 16830

TIERNEY, DENNIS, Dec'd
A/k/a **DENNIS J. TIERNEY**.
Late of Ramey.
Executor: **BARBARA L. LYNN**
P.O. Box 58
Ramey, PA 16671

First Publication

VIEHDORFER, L. CLAIR, Dec'd
A/k/a **LAWRENCE CLAIR VIEHDORFER**
A/k/a **L. C. VIEHDORFER**
A/k/a **CLAIR VIEHDORFER**
A/k/a **LAWRENCE C. VIEHDORFER**
Late of Karthaus
Co-Executrices:
LINDA VIEHDORFER DIVINEY
JANET VIEHDORFER MOORE
Attorney: **GATES & SEAMAN**
PO Box 846
Clearfield, PA 16830

BLAKE, ROSE MARIE, Dec'd
A/k/a **ROSE M. BLAKE**
A/k/a **ROSE BLAKE**
Late of Westover Borough
Administrator: **RENEE M. SECKINGER**
Attorney: **GATES & SEAMAN**
PO Box 846
Clearfield, PA 16830

McCOMBS, BROOKS, Dec'd
A/k/a **BROOKS CLELLAND McCOMBS**
Late of Curwensville
Co-Executrices: **BARBARA BROWN**
FAYE TUBBS
Attorney: **R. DENNING GEARHART**
215 East Locust Street
Clearfield, PA 16830

ARNOLD, JOHN J., Dec'd
Late of Curwensville
Executor: **JOHN J. ARNOLD JR.**
Attorney: **DAVID S. AMMERMAN**
310 East Cherry Street
Clearfield, PA 16830

O'DONNELL, BENJAMIN E., Dec'd
Late of Beccaria Township
Executor: **ALICE J. O'DONNELL**
Attorney: **RAYMOND J. WENDEKIER**
36 Magee Avenue
Patton, PA 16668

WALL, HELEN N., Dec'd
Late of Bloom Township
Executor: **ROD A. WALL**
Attorney: **GARY C. HORNER**
PO Box 280
Johnstown, PA 15907

FREDERICK, GRACE SMITH, Dec'd
A/k/a **GRACE FREDERICK**
Administrator:
LINDA JEAN BALLAROTTO
Attorney: **WM. LYNN HOLLEN**
1633 E. Pleasant Valley Blvd.
Altoona, PA 16602

ARTICLES OF INCORPORATION

NOTICE IS HEREBY GIVEN, that Articles of Incorporation were filed with the Department of State of the Commonwealth of Pennsylvania on the 27th day of March, 2002 for the purpose of obtaining a Certificate of Incorporation of a proposed business corporation to be organized under the Corporation Law of the Commonwealth of Pennsylvania of 1988.

The name of the corporation is **TWO ROADS COUNSELING SERVICE, INC.**

The purpose for which it is to be organized is to have unlimited power to engage in and to do any lawful act concerning any or all lawful business for which corporations may be incorporated under the Pennsylvania Corporation Law of 1988.

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

NOTICE

IN RE: Estate of **RANDY A. LINGLE**,
Deceased, late of Lawrence Township,
Clearfield County, Pennsylvania.

TO ALL CREDITORS OF **RANDY A. LINGLE**, DECEASED, NOTICE IS HEREBY GIVEN THAT a Petition for Settlement of Small Estate pursuant to 20 Pa. C.S.A. 3102 has been filed in the Orphans' Court Division of the Court of Common Pleas of Clearfield County and a hearing to consider said Petition has been scheduled for the 13th day of June, 2002, at 1:30 o'clock p.m. in the Courtroom Number 1 of the Clearfield County Courthouse, Clearfield, Pennsylvania. Said Petition may be granted by the Court unless exceptions are filed before the date and time of said hearing.

By: Andrew P. Gates, Esquire, **GATES & SEAMAN**, Two North Front Street, PO Box 846, Attorneys for Petitioner, Ryan A. Lingle.

George Will and John E. Reese referred to Paragraph 20 of the Complaint which is hereby incorporated by reference and made a part hereof, and to distinguish any interest or equity that Rebecca J. Arthur, her heirs, personal representatives or assigns may have had in the premises following the execution of said deed.

WHEREUPON the Court ordered that notice of said action and the facts thereto be served on the Defendants L. E. Dots, Hannah Lockhart, Thomas Lockhart, Arthur Bros., and Rebecca J. Arthur, their heirs, executors, administrators and assigns, to answer the said complaint within twenty (20) days from the date of this publication. For failure to comply, a judgment will be taken by application of Plaintiff's before the Court at a hearing to be held on June 13, 2002, at 1:30 P.M., at the Clearfield County Courthouse, Clearfield, Pennsylvania.

BEINI & KUBISTA, Attorneys at Law,
15 North Front Street, Clearfield, PA 16830.
Attorneys for Plaintiff.

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

RAYMOND A. SMITH and SHIRLEY B.	:	
SMITH, his wife,	:	
	Plaintiffs	:
	:	No. 02-571-CD
vs.	:	
	:	ACTION TO QUIET TITLE
L. E. Dotts, Hannah Lochrie,	:	
Thomas Lochrie, Arthur Bros., and	:	
Rebecca J. Arthur, their heirs	:	
executors, administrators and	:	
assigns,	:	
	Defendants	:

FILED

JUN 13 2002

William A. Shaw
Prothonotary

ORDER

AND NOW, this 13th day of June, 2002, an Affidavit of Service of the Complaint with Notice to Defend having been filed stating that the complaint and notice was served on all Defendants by publication, and no responsive pleading having been filed by said Defendants, the Defendants having not appeared in person or by attorney upon motion of Carl A. Belin, Jr., Attorney for Plaintiffs, it is the **ORDER** of this Court that title to said premises is found to be vested in the Plaintiffs and that they be allowed to enjoy said property in peace. Said property is identified in the Clearfield County Tax Maps as Parcel Number 8-115-13, which is located in Glen Hope Borough, Clearfield County,

Clearfield Pennsylvania, more particularly bounded and described as follows:

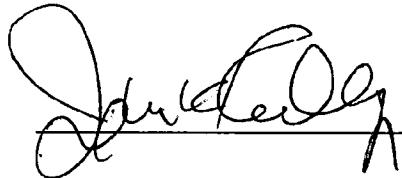
BEGINNING at a post by land of Joshua Comstock; thence North thirty-three (33°) degrees West twelve (12) perches to a hemlock; thence North seventy-five (75°) degrees West sixty-two (62) perches to a hemlock; thence North forty-seven (47°) degrees West thirty-one (31) perches to a hemlock; thence North twenty-three (23°) degrees West thirty-eight (38) perches to a hemlock; thence South fifty-two (52°) degrees West twenty-eight (28) perches to post in Blue Run; thence down said Run South twenty-five (25°) degrees East forty (40) perches to a post; thence South forty-five (45°) degrees East twenty-eight (28) perches to post; thence South sixty (60°) degrees East, sixty-five (65) perches to a post; thence South eighty-one (81°) degrees East six (6) perches to a post in Run; thence North seven (7°) degrees East twenty-one (21) perches to post; thence South eighty-one (81°) degrees East twenty-one (21) perches to post; thence North seven (7°) degrees East two and one-fourth ($2-1/4$) perches to a post; thence North eighty-one (81°) degrees East ten (10) perches to place of beginning.

CONTAINING twenty-three (23) acres and eighteen (18) perches.

It is the FURTHER ORDER of this Court that unless the Defendants file a responsive pleading to the complaint or institute an action in ejectment within thirty (30) days of the date hereof,

the Defendants shall be forever barred from asserting any right, lien, title or interest in the land inconsistent with the interest of the claim of the Plaintiffs set forth in their Complaint. If Defendants fail to take such action within the thirty (30) day period, the Prothonotary on Praecept of the Plaintiffs shall enter final judgment against Defendants.

BY THE COURT,

A handwritten signature in black ink, appearing to read "J. W. Kelly", is written over a horizontal line.

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

RAYMOND A. SMITH and SHIRLEY B.	:	
SMITH, his wife,	:	
Plaintiffs	:	
	:	No. 02-571-C.D.
vs.	:	
	:	ACTION TO QUIET TITLE
L. E. DOTT, HANNAH LOCHRIE,	:	
THOMAS LOCHRIE, ARTHUR BROS., and	:	PRAECIPE FOR FINAL
REBECCA J. ARTHUR, their heirs	:	JUDGMENT
executors, administrators and	:	
assigns,	:	
Defendants	:	

Filed on behalf of
Plaintiffs

Counsel of Record for
this Party:

Carl A. Belin, Jr.
Attorney-at-Law
Pa. I.D. 06805

Belin & Kubista
15 North Front Street
P.O. Box 1
Clearfield, PA 16830

(814) 765-8972

FILED

JUL 15 2002
COURT RECORDS
William A. Shaw
Prothonotary

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

RAYMOND A. SMITH and SHIRLEY B. :
SMITH, his wife, :
Plaintiffs :
: No. 02-571-CD
vs. :
: ACTION TO QUIET TITLE
L. E. Dotts, Hannah Lochrie, :
Thomas Lochrie, Arthur Bros., and :
Rebecca J. Arthur, their heirs :
executors, administrators and :
assigns, :
Defendants :

PRAECIPE FOR FINAL JUDGMENT

TO THE PROTHONOTARY:

Please enter final judgment against the Defendants in the
above-captioned case for failure to comply with the Order of Court
directing Defendants to file objections within thirty (30) days
from the entry of Order of judgment in favor of Plaintiffs.

BELIN & KUBISTA


Carl A. Belin, Jr., Esq.
Attorney for Plaintiffs