

02-901-CD  
RICHARD W. PLATT et al -vs- TREASURE LAKE, INC.

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

RICHARD W. PLATT and ROBIN S. :  
PLATT, husband and wife, :  
BARRY ANDRULONIS and SUSAN :  
ANDRULONIS, husband and wife :  
Plaintiffs :  
vs. : No. 02-~~401~~ C.D.  
TREASURE LAKE, INC. and its : ACTION TO QUIET TITLE  
successors and assigns and any person :  
or entity claiming, or who might claim :  
title under the aforesaid defendant; and :  
any other person, persons, firms :  
partnerships, or corporate entities who :  
might claim title to the premises herein :  
described, :  
Defendant : Type of Pleading: Complaint  
: Filed on behalf of: Richard W. Platt and :  
Robin S. Platt, husband and wife and :  
Barry Andrulonis and Susan Andrulonis, :  
husband and wife  
: Counsel of Record for this party:  
: THE HOPKINS LAW FIRM  
: David J. Hopkins, Esquire  
: Supreme Court No. 42519  
: Lea Ann Heltzel, Esquire  
: Supreme Court No. 83998  
: 900 Beaver Drive  
: DuBois, Pennsylvania 15801  
: (814) 375-0300

**FILED**

JUN 05 2002

William A. Shaw  
Prothonotary

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

RICHARD W. PLATT and ROBIN S.	:	
PLATT, husband and wife,	:	
BARRY ANDRULONIS and SUSAN	:	
ANDRULONIS, husband and wife	:	
Plaintiffs	:	
vs.	:	No. 02- C.D.
TREASURE LAKE, INC. and its	:	ACTION TO QUIET TITLE
successors and assigns and any person	:	
or entity claiming, or who might claim	:	
title under the aforesaid defendant; and	:	
any other person, persons, firms	:	
partnerships, or corporate entities who	:	
might claim title to the premises herein	:	
described,	:	
Defendant	:	

**NOTICE**

TO DEFENDANTS:

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 judgement 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.

Office of the Court Administrator  
Clearfield County Courthouse  
230 E. Market Street  
Clearfield, PA 16830  
(814) 765-2641

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

RICHARD W. PLATT and ROBIN S.	:	
PLATT, husband and wife,	:	
BARRY ANDRULONIS and SUSAN	:	
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Plaintiffs	:	
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TREASURE LAKE, INC. and its	:	ACTION TO QUIET TITLE
successors and assigns and any person	:	
or entity claiming, or who might claim	:	
title under the aforesaid defendant; and	:	
any other person, persons, firms,	:	
partnerships, or corporate entities who	:	
might claim title to the premises herein	:	
described,	:	
Defendant	:	

**COMPLAINT**

NOW COMES, Plaintiffs, Richard W. Platt and Robins S. Platt, husband and wife, and Barry Andrulonis and Susan Andrulonis, husband and wife, by and through their attorneys, The Hopkins Law Firm and avers as follows:

**COUNT I**

**Richard W. Platt and Robin S. Platt vs. Treasure Lake, Inc.**

1. Plaintiffs are husband and wife who reside together at 250 White Pine Road, DuBois, Clearfield County, Pennsylvania, 15801.

2. The property to be quieted is described as follows:

All that certain tract of land designated as Lot Number 65 Section 6A in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

3. The Defendant is Treasure Lake, Inc., believed to have formerly been a Pennsylvania corporation that is no longer in existence.

4. The whereabouts of the Defendant is unknown and the Defendant is believed to no longer be in existence nor have any successors or assigns.

5. By Deed dated July 23, 1969 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 559, at page 439, Defendant conveyed the property at issue unto Robert E. Rodewald and Audrey M. Rodewald, husband and wife.

6. By Deed dated July 7, 1972 and recorded in the Officer of the Recorder of Deeds of Clearfield County in Deed Book 643, at page 1, Defendant conveyed the property at issue unto David H. Hrbek and Susan W. Hrbek, husband and wife.

7. By Deed dated August 10, 1972 and recorded in the Officer of the Recorder of Deeds of Clearfield County in Deed Book 604, at page 28, the aforesaid Robert E. Rodewald and Audrey M. Rodewald conveyed the premises at issue unto the Defendant.

8. By Deed dated August 8, 1986 and recorded in the Officer of the Recorder of Deeds of Clearfield County in Deed Book 1113, at page 548, David H. Hrbek and Susan W. Hrbek conveyed the property at issue unto Harry L. Mowrey, et al.

9. By Deed dated April 23, 1989 and recorded in the Officer of the Recorder of Deeds of Clearfield County in Deed Book 1278, at page 438, Harry L. Mowrey and Lawrence A. Mowrey conveyed the property at issue unto Patrick H. Mowrey, et al.

10. By Deed dated November 23, 1992 and recorded in the Officer of the Recorder of Deeds of Clearfield County in Deed Book 1714, at page 296, Patrick H. Mowrey, et al. conveyed the property at issue unto Richard W. Platt and Robin S. Platt, husband and wife.

11. By Deed dated April 9, 2002 and recorded in the Officer of the Recorder of Deeds of

Clearfield County as Instrument No. 2002 06474, Richard W. Platt and Robin S. Platt conveyed the property at issue unto Plaintiffs, Richard W. Platt and Robin S. Platt, husband and wife.

12. As set forth herein, Defendant conveyed the property at issue first to Robert E. Rodewald and Audrey M. Rodewald by Deed dated July 23, 1969 and again conveyed the property to David H. Hrbek and Susan W. Hrbek prior to receiving a deed from Robert and Audrey Rodewald. The purpose of this Quiet Title Action is to remove any clouds upon the title as a result of the second transfer by the Defendant.

WHEREFORE, the Plaintiffs' request the Court to decree that title to the premises described herein be granted unto Plaintiffs in fee simple and absolutely; and that the Defendant, its, successors and assigns, and all other person, persons, firms, partnerships, or corporate entities in interests, or their legal representatives be forever barred from asserting any right, lien, or interest inconsistent with the interest or claim of the Plaintiffs as set forth herein, in and to the property described as all that certain tract of land designated as Lot Number 65, Section 6A in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

#### COUNT II

##### Barry M. Andrulonis and Susan J. Andrulonis vs. Treasure Lake, Inc.

13. Plaintiffs are husband and wife who reside together at 1721 Treasure Lake, DuBois, Clearfield County, Pennsylvania, 15801.

14. The property to be quieted is described as follows:

All that certain tract of land designated as Section 6A, Lot 64 in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

15. The Defendant is Treasure Lake, Inc., who was a Pennsylvania corporation that is no longer in existence.

16. The whereabouts of the Defendant are unknown and the Defendant is believed to no longer be in existence.

17. By Deed dated July 23, 1969 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 559, at page 442, Defendant conveyed the property at issue unto Robert E. Rodewald and Audrey M. Rodewald, husband and wife.

18. By Deed dated July 28, 1972 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 642 at page 298, Defendant conveyed the property at issue unto Jerry R. Ely and Kay Ely, husband and wife.

19. By Deed dated August 10, 1972 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 604, at page 25, the aforesaid Robert E. Rodewald and Audrey M. Rodewald conveyed the premises at issue unto the Defendant.

20. By Deed dated July 28, 1986 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 1113, at page 536, Jerry R. Ely and Kay Ely conveyed the property at issue unto Harry L. Mowrey, et al.

21. By Deed dated April 23, 1989 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 1278, at page 438, Harry L. Mowrey and Lawrence A. Mowrey conveyed the property at issue unto Patrick H. Mowrey, et al.

22. By Deed dated November 23, 1992 and recorded in the Office of the Recorder of Deeds of Clearfield County in Deed Book 1714, at page 296, Patrick H. Mowrey, et al. conveyed the property at issue unto Richard W. Platt and Robin S. Platt, husband and wife.

23. By Deed dated April 9, 2002 and recorded in the Office of the Recorder of Deeds of Clearfield County as Instrument No. 200206475, Richard W. Platt and Robin S. Platt conveyed the property at issue unto Plaintiffs, Barry Andrlonis and Susan Andrlonis.

24. As set forth herein, Defendant conveyed the property at issue first to Robert E. Rodewald and Audrey M. Rodewald by Deed dated July 23, 1969 and again conveyed the property to Jerry R. Ely and Kay Ely prior to receiving a deed from Robert and Audrey Rodewald. The purpose of this Quiet Title Action is to remove any clouds upon the title as a result of the second transfer by the Defendant.

WHEREFORE, the Plaintiffs' request the Court to decree that title to the premises described herein be granted unto Plaintiffs in fee simple and absolutely; and that the Defendant, its, successors and assigns, and all other person, persons, firms, partnerships, or corporate entities in interests, or their legal representatives be forever barred from asserting any right, lien, or interest inconsistent with the interest or claim of the Plaintiffs as set forth herein, in and to the property described as all that certain tract of land designated as Lot Number 64, Section 6A in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

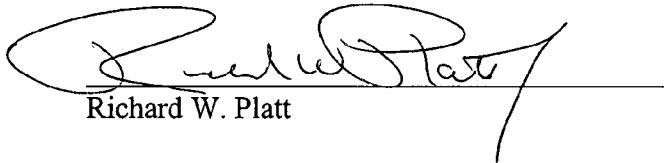
Respectfully submitted,



\_\_\_\_\_  
David J. Hopkins, Esquire  
Attorney for Plaintiffs

VERIFICATION

With full understanding that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities, I verify that the statements made in this pleading are true and correct.

  
Richard W. Platt

Date: May 31, 2002

VERIFICATION

With full understanding that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities, I verify that the statements made in this pleading are true and correct.

  
\_\_\_\_\_  
Robin S. Platt

Date: May 31, 2002

VERIFICATION

With full understanding that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities, I verify that the statements made in this pleading are true and correct.

Susan Andrlonis  
Susan Andrlonis

Date: 5/1/02, 2002

VERIFICATION

With full understanding that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities, I verify that the statements made in this pleading are true and correct.

  
Barry Andrulonis

Date: 5/17/02, 2002

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

RICHARD W. PLATT and ROBIN S. :

PLATT, husband and wife, :

BARRY ANDRULONIS and SUSAN :

ANDRULONIS, husband and wife :

Plaintiffs :

vs. :

No. 02-~~901~~ C.D.

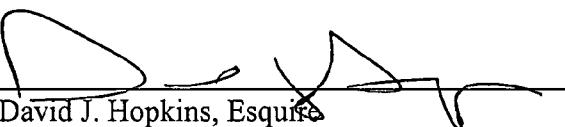
TREASURE LAKE, INC. and its  
successors and assigns and any person  
or entity claiming, or who might claim  
title under the aforesaid defendant; and  
any other person, persons, firms,  
partnerships, or corporate entities who  
might claim title to the premises herein  
described,

ACTION TO QUIET TITLE

Defendant :

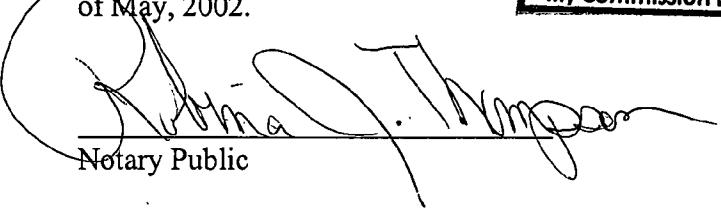
**AFFIDAVIT OF UNKNOWN WHEREABOUTS**

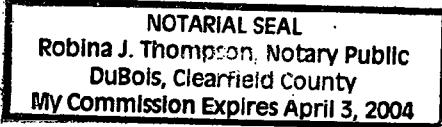
David J. Hopkins, Esquire, being duly sworn according to law, hereby certifies that he has made a search of the records of the Pennsylvania Department of State in an effort to ascertain successors or assigns of Treasure Lake, Inc. and to the best knowledge, information and belief of your Affiant, Treasure Lake, Inc. is no longer a corporate entity which operates and there are no successors or assigns of the corporation.

  
David J. Hopkins, Esquire

Date: May 31st, 2002

Sworn to and subscribed  
before me, this 31st day  
of May, 2002.

  
Notary Public



**FILED**

  
JUN 05 2002

William A. Shaw  
Prothonotary

**FILED**

JUN 05 2002

*NO  
cc*

*William A. Shaw  
Prothonotary*

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

RICHARD W. PLATT and ROBIN S.  
PLATT, husband and wife,  
BARRY ANDRULONIS and SUSAN  
ANDRULONIS, husband and wife  
Plaintiffs

vs. : No. 02-901 C.D.

TREASURE LAKE, INC. and its successors and assigns and any person or entity claiming, or who might claim title under the aforesaid defendant; and any other person, persons, firms partnerships, or corporate entities who might claim title to the premises herein described,

Defendant :

## ACTION TO QUIET TITLE

**FILED**

JUN 05 2002

William A. Shaw  
Prothonotary

## **MOTION FOR PUBLICATION**

AND NOW, this 24 day of June, 2002 an Affidavit having been executed and filed on behalf of Richard W. Platt and Robin S. Platt, husband and wife, and Barry Andrulonis and Susan Andrulonis, husband and wife, and that the whereabouts of Treasure Lake, Inc., its successors and assigns, and all other person, persons claiming, or might claim title under the aforesaid defendant, and any person, persons, firms, partnerships, or corporate entities who might claim title to the premises herein described, are unknown.

The Plaintiffs, by their counsel, The Hopkins Law Firm, requests the Court for leave to serve the Complaint on the above mentioned Defendant, its successors and assigns, and all other person, persons claiming, or might claim title under the aforesaid defendant, and any person, persons, firms, partnerships, or corporate entities who might claim title to the premises herein described, or their legal representatives, generally, by publication in such manner as the Court shall direct and as provided by the Pa. R.C.P. Rule 410, and Pa.R.C.P. Rule 430.

  
DAVID J. HOPKINS, ESQUIRE

FILED

NO  
cc

JUN 05 2002

*See*  
William A. Shaw  
Prothonotary

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

RICHARD W. PLATT and ROBIN S. :  
PLATT, husband and wife, :  
BARRY ANDRULONIS and SUSAN :  
ANDRULONIS, husband and wife :  
Plaintiffs :  
vs. :  
TREASURE LAKE, INC. and its :  
successors and assigns and any person :  
or entity claiming, or who might claim :  
title under the aforesaid defendant; and :  
any other person, persons, firms :  
partnerships, or corporate entities who :  
might claim title to the premises herein :  
described,  
Defendant :

No. 02-901 C.D.

ACTION TO QUIET TITLE

**FILED**

JUN 06 2002

William A. Shaw  
Prothonotary

**ORDER FOR PUBLICATION**

AND NOW, this 6<sup>th</sup> day of June, 2002, upon the consideration of the foregoing Motion, the Plaintiffs are granted leave to make service of the Complaint on the above mentioned Defendant, their heirs, devisees, administrators, executors, assigns, and all other person, persons, firms, partnerships, or corporate entities in interest, or their legal representatives, by publication one time in The Courier Express, a newspaper published in the City of DuBois, in general circulation of the County of Clearfield, Commonwealth of Pennsylvania, and in The Clearfield Legal Journal.

BY THE COURT,

JUDGE

**FILED**

1cc

01/10/2002  
JUN 06 2002  
Sear  
Atty Hopkins

William A. Shaw  
Prothonotary

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

RICHARD W. PLATT and ROBIN S. :  
PLATT, husband and wife, :  
BARRY ANDRULONIS and SUSAN :  
ANDRULONIS, husband and wife :  
Plaintiffs :  
:  
vs. : No. 02- 901 C.D.  
:  
TREASURE LAKE, INC. and its : ACTION TO QUIET TITLE  
successors and assigns and any person :  
or entity claiming, or who might claim :  
title under the aforesaid defendant; and :  
any other person, persons, firms :  
partnerships, or corporate entities who :  
might claim title to the premises herein :  
described,  
Defendant :  
:

**AFFIDAVIT**

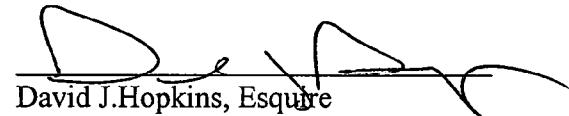
COMMONWEALTH OF PENNSYLVANIA : : SS.  
COUNTY OF CLEARFIELD : :

Personally appeared before me, the undersigned officer, David J. Hopkins, Attorney for Richard W. Platt, Robin S. Platt, Barry Andrulonis and Susan Andrulonis, who, being duly sworn according to law, deposes and says that the service of the foregoing Complaint to Quiet Title, endorsed with Notice to Plead, has been served upon Defendant, Treasure Lake, Inc. and its successors and assigns, by publication, and than twenty (20)

**FILED**

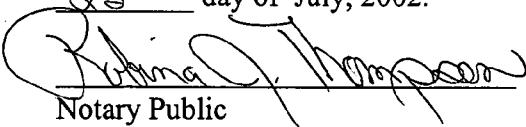
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019501N0CC E  
William A. Shaw  
Prothonotary

days have elapsed since said service and Defendant has not filed an appearance or any answer to the Complaint, although the time in which to do so has expired.



David J. Hopkins, Esquire

Sworn to and subscribed before me this  
25<sup>th</sup> day of July, 2002.



Robina J. Thompson  
Notary Public

<b>NOTARIAL SEAL</b> <b>Robina J. Thompson, Notary Public</b> <b>DuBois, Clearfield County</b> <b>My Commission Expires April 3, 2004</b>
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA  
(CIVIL DIVISION)

RICHARD W. PLATT and ROBIN S. :  
PLATT, husband and wife, :  
BARRY ANDRULONIS and SUSAN :  
ANDRULONIS, husband and wife :  
Plaintiffs :

vs. :

TREASURE LAKE, INC. and its :  
successors and assigns and any person :  
or entity claiming, or who might claim :  
title under the aforesaid defendant; and :  
any other person, persons, firms :  
partnerships, or corporate entities who :  
might claim title to the premises herein :  
described, :

Defendant :

No. 02- 901 C.D.

ACTION TO QUIET TITLE

Type of Pleading: Motion for Judgment

Filed on behalf of: Richard W. Platt,  
Robin S. Platt, Barry Andrulonis and  
Susan Andrulonis, Plaintiffs.

Counsel of Record for this party:

DAVID J. HOPKINS, ESQUIRE  
Attorney at Law

Supreme Court No. 42519  
900 Beaver Drive  
DuBois, Pennsylvania 15801

(814) 375-0300

**FILED**

JUL 29 2002

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William A. Shaw  
Prothonotary *WAS*

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

RICHARD W. PLATT and ROBIN S.	:
PLATT, husband and wife,	:
BARRY ANDRULONIS and SUSAN	:
ANDRULONIS, husband and wife	:
Plaintiffs	:
vs.	:
	No. 02- 901 C.D.
TREASURE LAKE, INC. and its	:
successors and assigns and any person	:
or entity claiming, or who might claim	:
title under the aforesaid defendant; and	:
any other person, persons, firms	:
partnerships, or corporate entities who	:
might claim title to the premises herein	:
described,	:
Defendant	:

**MOTION FOR JUDGMENT**

AND NOW, this 26th day of July, 2002, an Affidavit having been filed by David J. Hopkins, Esquire, Attorney for Plaintiffs, Richard W. Platt, Robin S. Platt, Barry Andrulonis and Susan Andrulonis; that the Complaint with Notice to Plead was served on the Defendant by publication and the Defendant has not answered. The Plaintiffs, Richard W. Platt, Robin S. Platt, Barry Andrulonis and Susan Andrulonis, by and through their attorney, move the Court to enter judgment in favor of the Plaintiffs and against the Defendant in the above named case and to grant to the Plaintiffs the relief prayed for in accordance with Rules of Civil Procedure 1066. Plaintiffs further requests that the Honorable Court modify in accordance with Rules of

Civil Procedure, Rule 248, the thirty (30) day period provided Defendant by Rules of Civil Procedure, Rule 1066(b) to assert any right, lien, title or interest in the land inconsistent with the interest or claim Plaintiffs set forth in their Complaint.

Respectfully submitted,



David J. Hopkins, Esquire

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, 1 North Second Street,  
Clearfield, PA 16830. (814) 765-2641  
David J. Hopkins, Esquire, Attorney for  
Plaintiff, 900 Beaver Drive, DuBois, PA  
15801 (814) 375-0300

thereon as Lot 6. Said survey being made a part hereof by reference thereto, EXCEPTING AND RESERVING unto Grantees, their heirs, successors and assigns, whether future or past, a ten (10) foot permanent easement to support a sewage system starting at the end of the existing culvert of Township road T-232, extending through the property herein being conveyed and continuing near the northeastern edge of the property as shown on the above referenced survey and sub-

FURTHER BEING the same premises  
designated as Lot 6 on a certain subdivision  
map dated August 4, 1998 prepared by  
Associates to be recorded  
division map.

**RAUCH, ROBERTA A., Dec'd**  
Late of Morrisdale  
**Executrix: JENNIFER P. LEADER**  
**Attorney: F. CORTEZ BELL III**  
PO Box 670  
Clearfield, PA 16830

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**REGISTER & ORPHANS' COURT  
NOTICES**

Notice is hereby given that the following Accounts have been examined by me and remain in the Office of Karen L. Starck, Register of Wills for the inspection of the heirs, legatees and creditors and all others interested and will be presented to the Orphans' Court of Clearfield County, PA on the first Monday of June, 2002.

The Accounts will be presented to the Orphans' Court for Confirmation NISI on the first Monday in July, 2002, and if no Objections or Exceptions are filed to the Account, it will be Confirmed Absolutely as of course without further notice by the Court in 10 days.

First & Final Account of Patricia L. Moskol a/k/a Patricia Washic, Executrix of the Estate of John L. Moskol a/k/a John Moskol, late of Cooper Township, Clearfield County, PA, DECEASED.

First and Final Account of Lorraine L. Gearhart, Executrix of the Estate of Irene C. Stauffer, late of Clearfield, Clearfield County, PA, DECEASED.

First & Final Account of David K. Reed and Emily C. Reed, Co-Executors, of the Estate of Francis K. Reed, late of DuBois, Clearfield County, PA, DECEASED.

First & Final Account of Mary Raybuck and Vaughn Raybuck, Co-Executors of the Estate of Marguerite M. Leon, late of DuBois, Clearfield County, PA, DECEASED.

First & Final Account of Julia A. Allshouse, Executrix of the Estate of Margaret A. Burns a/k/a Margaret C. Burns, late of DuBois, Clearfield County, PA, DECEASED.

First & Final Account of Henry F. Anderson, Administrator of the Estate of Cindy R. Anderson, late of DuBois, Clearfield County, PA, DECEASED.

Second & Partial Account of S & T Bank, Trustee of Donald B. Kiel FBO Laura Allen Hindawy Trust D/T/D June 4, 1992.

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

RICHARD W. PLATT and ROBIN S. PLATT, husband and wife, BARRY ANDRULONIS and SUSAN ANDRULONIS, husband and wife, Plaintiffs vs. TREASURE LAKE, INC. and its successors and assigns and any person or entity claiming, or who might claim title under the aforesaid defendant; and any other person, persons, firms partnerships, or corporate entities who might claim title to the premises herein described, Defendant.

No. 02-901-CD

ACTION TO QUIET TITLE

TO: Treasure Lake Inc. its successors and assigns and any person or entity claiming, or who might claim title under the aforesaid defendant; and any other person, persons, firms, partnerships or corporate entities in interest.

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

All that certain tract of land designated as Section 6A, Lot Numbers 64 and 65 in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

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.

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

## PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : :

COUNTY OF CLEARFIELD : :

On this 26th day of June 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 June 21, 2002, Vol. 14 No. 25. 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

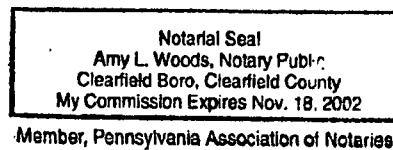
Sworn and subscribed to before me the day and year aforesaid.



Amy L. Woods

Notary Public

My Commission Expires



David J. Hopkins  
900 Beaver Drive  
DuBois, PA 15801

# PROOF OF PUBLICATION

STATE OF PENNSYLVANIA :

COUNTY OF CLEARFIELD :

On this 26th day of June AD 2005, before me, the subscriber, a Notary Public in and for said County and State, personally presented Gerald A. Knalesspold editor of the Clearfield County Daily Journal of the County of Clearfield County, and that the annexed is a true copy of the notice of advertisement published in said publication in the regular issues of Week of June 21, 2005, Vol. 14 No. 25. And that all of the statements of this statement as to the times, place, and character of the publication are true.

Gerald A. Knalesspold, Esquire  
Editor

Sworn and subscribed to before me the 26th day and year above-said.

Notary Public  
My Commission Expires

David T. Hopkins  
800 Beaver Drive  
Dubois, PA 15801

Notary Public My Commission Expires
David T. Hopkins 800 Beaver Drive Dubois, PA 15801
PA Notary Public My Commission Expires On or before June 26, 2005 PA Notary Public My Commission Expires On or before June 26, 2005

**PROOF OF PUBLICATION OF NOTICE APPEARING IN THE  
SUNDAY/JEFFERSONIAN DEMOCRAT  
AN PUBLISHING COMPANY,  
PENNSYLVANIA**

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

Received May 16, 1929, P.L. 1784

RICHARD W. PLATT and ROBIN S.  
PLATT, husband and wife, BARRY  
ANDRULONIS and SUSAN ANDRULONIS,  
husband and wife  
Plaintiffs

VS.

TREASURE LAKE, INC. and its  
successors and assigns and any  
person or entity claiming, or who might  
claim title under the aforesaid defendant;  
and any other person, persons, firms  
partnerships, or corporate entities who might  
claim title to the premises herein described,  
Defendant

No. 02-901 CD  
ACTION TO QUIET TITLE

, Classified Advertising Supervisor of the **Courier-  
Democrat** of the County and State aforesaid, being duly  
authorized by the **Tri-County Sunday**, a  
daily newspaper, the **Tri-County Sunday**, a  
weekly newspaper published by McLean Publishing  
County and State aforesaid, which was established in  
publication and the weekly publications, has been  
of the printed notice of publication is attached hereto  
in the regular editions of the paper on the following

**QUIET TITLE ACTION NOTICE**

TO: Treasure Lake, Inc. its successors and assigns and any person  
or entity claiming, or who might claim title under the aforesaid defendant;  
and any other person, persons, firms, partnerships or corporate  
entities in interest.

You are hereby notified that an action to quiet title to the premises  
situate, lying and being in Sandy Township, Clearfield County, Penn-  
sylvania, has been filed against you. Said premises are described as  
follows:

All that certain tract of land designated as Section 6A, Lot Numbers  
64 and 65 in the Treasure Lake Subdivision in Sandy Township,  
Clearfield County, Pennsylvania.

You have been sued in Court. The purpose of this quiet title action is  
to extinguish any right or equity which the Defendant above named  
and its 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 Defendant or its de-  
scessors or heirs.

Whereupon the Court Ordered that notice of said action be served on  
the Defendant, and its heirs.

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 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, Pennsylvania 16830  
(814) 765-2641

David J. Hopkins  
Attorney for Plaintiffs  
900 Beaver Drive  
DuBois, PA 15801  
(814) 375-0300

6/12/02

\_\_\_\_ day of June A.D. 2002

\_\_\_\_ day of June A.D. 2002  
I, the affiant, hereby declare under oath and also declared that affiant is not  
of the notice of publication, and that all allegations in the  
acter of publication are true.

**PUBLISHING COMPANY Publisher of  
SUNDAY/JEFFERSONIAN DEMOCRAT**

*W. Kronenwetter*

17th day of June

NOTARIAL SEAL  
STEVEN W. KRONENWETTER, NOTARY PUBLIC  
CITY OF DuBOIS, CLEARFIELD COUNTY  
MY COMMISSION EXPIRES APRIL 16, 2006

*W. Kronenwetter*

ary Public

of Advertising Cost

LISHING COMPANY

ublisher of

**TRI-COUNTY SUNDAY/**

**JEFFERSONIAN DEMOCRAT**

Bois, PA

notice or advertisement  
e stated dates.....\$ 91.80  
.....\$ 4.25  
.....\$ 96.05

t for Advertising Costs

ri-County Sunday, a weekly newspaper, and/or  
er, hereby acknowledges receipt of the aforesaid  
certifies that the same have been fully paid:

3 Beaver Drive, DuBois, PA 15801  
Phone 814-371-4200

**JISHING COMPANY**

Publisher of

**COURIER-EXPRESS/TRI-COUNTY SUNDAY/JEFFERSONIAN DEMOCRAT**

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

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

RICHARD W. PLATT and ROBIN S. :  
PLATT, husband and wife, :  
BARRY ANDRULONIS and SUSAN :  
ANDRULONIS, husband and wife :  
Plaintiffs :  
:  
vs. : No. 02- 901 C.D.  
:  
TREASURE LAKE, INC. and its : ACTION TO QUIET TITLE  
successors and assigns and any person :  
or entity claiming, or who might claim :  
title under the aforesaid defendant; and :  
any other person, persons, firms :  
partnerships, or corporate entities who :  
might claim title to the premises herein :  
described,  
Defendant :  
:

ORDER

**FILED**

JUL 29 2002  
013:20/1cc atty Hopkins  
William A. Shaw  
Prothonotary  
EFCB

AND NOW, this 29<sup>th</sup> day of July, 2002, it appearing that service of the Complaint to Quiet Title in the above stated action was served upon Defendant, Treasure Lake, Inc., pursuant to the Rules of Civil Procedure; and by Affidavit of David J. Hopkins, Attorney for Plaintiffs, that no answer or appearance has been filed to said action, and on Motion of David J. Hopkins, Esquire, it is hereby ORDERED and DECREED:

1. That the Defendant, Treasure Lake, Inc. its successors and assigns and all other person, persons, firms, partnerships, or corporate entities in interest, are forever barred from asserting any right, title, lien or interest inconsistent with the interest or claim of the Plaintiffs as set forth in their Complaint in and to:

**PARCEL I.**

All that certain tract of land designated as Lot Number 65 Section 6A in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

**PARCEL II.**

All that certain tract of land designated as, Lot Number 64, Section 6A in the Treasure Lake Subdivision in Sandy Township, Clearfield County, Pennsylvania.

2. That title to Parcel I is now vested in Richard W. Platt, Robin S. Platt and title to Parcel II is now vested in Barry Andrulonis and Susan Andrulonis, as prayed.

3. That the rights of the Plaintiffs are superior to the rights of the Defendant, Treasure Lake, Inc., its successors and assigns who might claim title under the aforesaid Defendant; and any other person, persons, firms, partnerships, or corporate entities who might claim title to the premises herein described.

4. That the Plaintiffs have title in fee simple to said premises as described in the Complaint as against the Defendant, Treasure Lake, Inc., its successors and assigns as set forth in paragraph 2 of this Order.

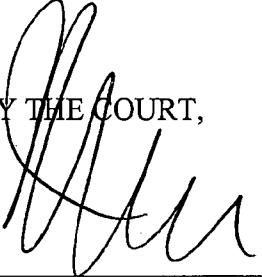
5. That the Defendant, Treasure Lake, Inc., its successors and assigns are forever barred from asserting any right, title or interest in or to the premises described which are inconsistent with the interest or claims of the Plaintiffs as set forth in their Complaint and from setting up any title to the premises and from impeaching, denying or in any way attacking the title of the Plaintiffs to the premises.

6. That the thirty (30) days provisions of Pennsylvania Rules of Civil Procedure 1066(b)(i) be modified as to eliminate the said thirty (30) day Rule of Pennsylvania Rules of Civil Procedure from this case. Said modification is in accordance with the authority vested in

this Court by virtue of Pennsylvania Rules of Civil Procedure 248 to eliminate any time period prescribed by Pennsylvania Rules of Civil Procedure upon Order of Court.

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

8. That a certified copy of this Order shall be recorded in the Office of the Recorder of Deed of Clearfield County, Pennsylvania.

BY THE COURT,  


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JUDGE