

02-1960-CD
THOMAS G. KELLY, et al. vs. THOMAS TANGLEFERRY, et al.

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

THOMAS G. KELLY and
DEBRA A. KELLY, Husband
and wife,

Plaintiffs

vs.

No. 2002 - 1960-CD
Action to Quiet Title

THOMAS TANGLEFERRY, a/k/a,
THOMAS TAGLIFERRE, a/k/a,
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any INDIVIDUALS
CLAIMING THROUGH THEM,

Defendants

* Type of Case: Civil

*

*

*

* Type of Pleading: Complaint

*

*

*

*

* Filed on Behalf of: Plaintiffs

*

*

*

* Counsel of Record for this Party:

* James A. Naddeo, Esquire

*

* Supreme Court I.D. # 06820

* 211 1/2 East Locust Street

* P. O. Box 552

* Clearfield PA 16830

* 814 765-1601

*

*

*

FILED

DEC 18 2002

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and
DEBRA A. KELLY, Husband and Wife *
Plaintiffs

vs. No. 2002 - -CD
* Action to Quiet Title

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THOMAS TAGLIFERRE, a/k/a,
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any INDIVIDUALS
CLAIMING THROUGH THEM,
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 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 the 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 Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield PA 16830
814 765-2641

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

*

THOMAS G. KELLY and
DEBRA A. KELLY, Husband and Wife *

Plaintiffs

*

vs.

No. 2002- -CD

* Action to Quiet Title

THOMAS TANGLEFERRY, a/k/a,
THOMAS TAGLIFERRE, a/k/a,
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any INDIVIDUALS
CLAIMING THROUGH THEM,

Defendants

*

COMPLAINT

1. The Plaintiffs are Thomas G. Kelly and Debra A. Kelly, Husband and Wife, both of whom are *sui juris* individuals who reside at 413 Scofield Street, Curwensville, Clearfield County, Pennsylvania, 16833.

2. The Defendant Thomas Tangleferry a/k/a, Thomas Tagliferre a/k/a, Tomaso Tagliaferri, believed to be deceased; and the Heirs and Assigns and any Individuals claiming through him, whose addresses are unknown.

3. The Defendant Patsy Carfley deceased April 21, 1965 and is survived by the heirs set forth in Exhibit "A" attached hereto and incorporated here and by references set forth in full.

4. Plaintiffs are the owners of a tract of land located in Curwensville Borough, Clearfield County, Pennsylvania more particularly described on Exhibit "B" attached hereto and incorporated here and by references set forth in full.

5. The Plaintiffs acquired title to the premises by deed from Albert Carfley as Attorney in Fact for Joseph Carfley dated August 22, 1996 and recorded in Clearfield County Deed and Records Book, Volume 1782, page 509.

6. The Grantor of Paragraph 5 above acquired title to the premises by deed from Bessie Ferdinando and Bernard Ferdinando, her husband, dated February 21, 1957 and recorded in the Clearfield County Deed Book Volume 458, Page 30.

7. The Grantors of Paragraph 6 above acquired title to the premises by deed from the Borough of Curwensville, Pennsylvania and School District of the Borough of Curwensville, Pennsylvania both municipal corporations in the Commonwealth of Pennsylvania by deed dated June 15, 1943 and recorded in Clearfield County Deed Book Volume 403, Page 534.

8. The Grantors of Paragraph 7 above acquired title to the premises by deed from Commissioners of Clearfield County, Pennsylvania dated May 13, 1943 and recorded in Clearfield County Deed Book 346, Page 429.

9. The Grantor in Paragraph 8 above acquired title to the premises by deed from the Treasurer of the County of Clearfield, dated December 13, 1937 and recorded in Clearfield County Deed Book 346, Page 428. Being sold as the property of Thomas Tangleferry.

10. The property in question was assessed in the name of

Patsy Carfley for the years 1946 through 1959 inclusive.

11. The purpose of this Quiet Title Action is to clear any defect resulting from the tax sale set forth in Paragraph 9 above and the incorrect assessment set forth in Paragraph 10 above.

12. The Plaintiffs and their predecessors in title have exercised adverse, continuous, visible, notorious, exclusive and hostile possession over the premises and have continued such possession in excess of twenty-one (21) years.

WHEREFORE, Plaintiffs request:

(a) That by Decree of Your Honorable Court, it may be declared that title to the premises set forth in Paragraph 4 of this Complaint is in the Plaintiffs and that they shall be allowed to enjoy such property in peace, and;

(b) That the Defendants, within twenty (20) days from the receipt of this Compliant, institute an action of ejection 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 property, from issuing or maintaining an ejectment of said premises and from encumbering, mortgaging or conveying the said premises or any part thereof.



James A. Naddeo
Attorney for Plaintiffs

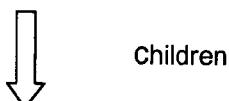
Patsy Carfley

d.o.d. – April 1965



Katherine Carfley

Widow (also deceased)



(s) Joseph Carfley

Curwensville Elder Care
Curwensville, PA 16833

(s) **Albert Carfley**

520 Bloomington Ave.
Curwensville, PA 16833

(s) Louie Carfley

326 State St.
Curwensville, PA 16833

(s) Raymond Carfley

501 Grampian Road
Curwensville, PA 16833

Elizabeth Carfley

deceased – no surviving spouse or children

Bessie Carfley Ferdinando (deceased)

(d) Shirley O'Neill, unknown

(d) Gloria Tecca, 76220 Fairway Drive, Indian Wells, CA 92210

(d) Janie Newman, Robinson St. DuBois PA 15801

(s) Bernard Ferdinando, 822 Charles St., Eastlake, OH 44095

Samuel Carfley (deceased)

(s) Patrick Carfley, 211 McLaughlin St., Curwensville, PA 16833
(d) Barbara Robinson, unknown

Michael Carfley (deceased)

(w) Louise Garfley, unknown

(d) Patricia Balocco, Route #1, Curwensville, PA 16823

Anthony Carfley (deceased)

Joyce (unknown), Curwensville, PA 16833
Thomas Carfley, 601 Anderson St, Curwensville, PA 16833
Patrick Carfley, Route #2, Curwensville, PA 16833
Albert L. Carfley, Hyde, PA 16843
Carol Smith, RD, Clearfield, PA 16830
Carrie Wilt, unknown
Jean (unknown), unknown
Shirley (unknown), unknown
Dotty (unknown), unknown
Kenneth Carfley, 101 Reighard St., Clearfield, PA 16830
Jerry Carfley, unknown
Thelma (unknown) (deceased)
survived by unknown

ALL that certain lot or piece of ground situate in the Borough of Curwensville, County of Clearfield, and Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a post corner of lot now or formerly of Eli N. Korb at a point Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center of Grampian Road; thence by said lot of Eli N. Korb North Thirty-One (31) degrees West One Hundred Sixty-Nine (169) feet to a post on an alley; thence by said alley South Fifty-Nine (59) degrees West Fifty (50) feet to a post at the corner of lot now or formerly of Mrs. James Freeman Estate; thence by said lot South Thirty-One (31) degrees East One Hundred Sixty-Five (165) feet to a post, Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center of Grampian Road; thence by said Grampian Road, Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center thereof, Fifty (50) feet to a post and place of beginning.

BEING further identified in the Map Assessment Office of Clearfield County as having Map No. H10-666-00015, consisting of garage and lot.

COMMONWEALTH OF PENNSYLVANIA)

ss.

COUNTY OF CLEARFIELD

)

Before me, the undersigned officer, personally appeared THOMAS G. KELLY and DEBRA A. KELLY, husband and wife, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint are true and correct to the best of their knowledge, information and belief.

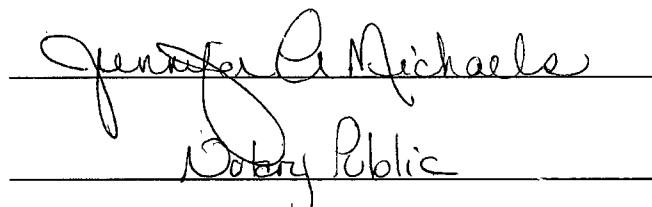


Thomas G. Kelly



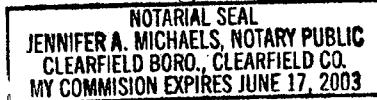
Debra A. Kelly

SWORN and SUBSCRIBED before me this 30th day of August, 2001.



Jennifer A. Michaels

Notary Public



2-26-03 Document
Reinstated/Referred to Street Attorney
for service. *[Signature]*

Followed by Motion to Publish notice
reinstated.

FILED 14cc
10/10/03 AM
Def 10/10/03 AM
Att'y Shaded
Att'y pd. 95.00
William A. Shaw
Prothonotary

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

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THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

AFFIDAVIT OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 13 2003
013:35 (w) *fw*
William A. Shaw
Prothonotary/Clerk of Courts
NO C FILED *fw*

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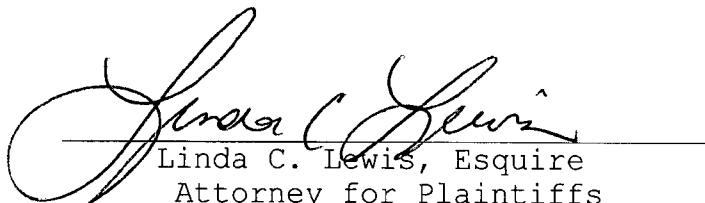
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)

.SS

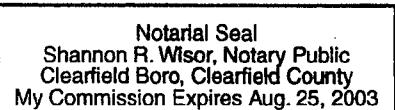
COUNTY OF CLEARFIELD)

Linda C. Lewis, Esquire, Attorney for the above-named Plaintiffs, being duly sworn according to law, deposes and states that a certified copy of the Complaint filed in the above-captioned action was served upon the Defendant, Bernard Ferdinando in accordance with Pa.R.C.P. 1930.4(c) by first-class mail, Restricted Delivery, return receipt requested on January 2, 2003, at the Defendant's residence of 822 Charles Street, Eastlake, OH 44093, as appears from the receipt of certified mail attached hereto.



Linda C. Lewis, Esquire
Attorney for Plaintiffs

SWORN and SUBSCRIBED before me this 13th day of January, 2003.



Shannon R. Wisor

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Bernard Ferdinand
822 Charles St.
Eastlake, OH 44095

COMPLETE THIS SECTION ON DELIVERY

A. Signature

 Agent Addressee

B. Received by (Printed Name)

BERNARD FERDINANDO

C. Date of Delivery

1-2-03

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

2. Article Number

(Transfer from service label)

7099 3400 0016 7883 3488

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

FILED

JAN 13 2003

William A. Shaw
Prothonotary/Clerk of Courts

JAMES A. NADDEO & ASSOCIATES
ATTORNEYS AT LAW
211½ EAST LOCUST STREET
P. O. BOX 552
CLEARFIELD, PENNSYLVANIA 16830

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

THOMAS G. KELLY and
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v.

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THOMAS TAGLIFERRE, a/k/a
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and ASSIGNS and any
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THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

AFFIDAVIT OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 13 2003
013:30PM

William A. Shaw
Prothonotary/Clerk of Courts
No Court Comm

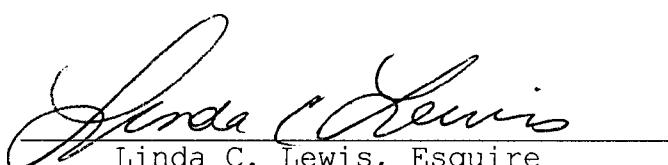
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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THOMAS G. KELLY and *
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Husband and wife, *
*
Plaintiffs, *
*
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v. * No. 02-1960-CD
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TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA) .SS
COUNTY OF CLEARFIELD)

Linda C. Lewis, Esquire, Attorney for the above-named Plaintiffs, being duly sworn according to law, deposes and states that a certified copy of the Complaint filed in the above-captioned action was served upon the Defendant, Gloria Tecca in accordance with Pa.R.C.P. 1930.4(c) by first-class mail, Restricted Delivery, return receipt requested on January 7, 2003, at the Defendant's residence of 76220 Fairway Drive, Indian Wells, CA 92210, as appears from the receipt of certified mail attached hereto.



Linda C. Lewis, Esquire
Attorney for Plaintiffs

SWORN and SUBSCRIBED before me this 13th day of January, 2003.

Notarial Seal
Shannon R. Wisor, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires Aug. 25, 2003

Shannon R. Wisor

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Gloria Tecca
76220 Fairway Drive
Indian Wells, CA 92210

2. Article Number

(Transfer from service label)

7099 3400 0016 7883 3495

PS Form 3811, August 2001

Domestic Return Receipt

102595-01-M-2509

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Gloria Tecca Agent
 Addressee

B. Received by (Printed Name)

G. Tecca 1-7-03 C. Date of Delivery

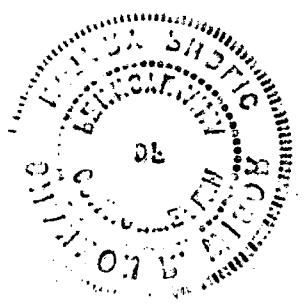
D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- | | |
|--|---|
| <input checked="" type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |

4. Restricted Delivery? (Extra Fee)

Yes



(

)

FILED

JAN 13 2003

William A. Shaw
Prothonotary/Clerk of Courts

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

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THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* **CERTIFICATE OF SERVICE**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 10 2003

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
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* v. * No. 02-1960-CD
* Action to Quiet Title
THOMAS TAGLEFERRY, a/k/a *
THOMAS TAGLIFERRE, a/k/a *
TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 10th day of January, 2003:

First-Class Mail, Postage Prepaid

Albert Carfley
520 Bloomington Avenue
Curwensville, PA 16833

Louie Carfley
326 State Street
Curwensville, PA 16833

Patrick Carfley
211 McLaughlin Street
Curwensville, PA 16833

Kenneth Carfley
101 Reighard Street
Clearfield, PA 16830

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

400
01.3.30.88
Anti-Nazidex

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

THOMAS G. KELLY and
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TOMASO TAGLIAFERRI,
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CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 15 2003

0/3:45/cons.

William A. Shaw
Prothonotary

3 court to ATR

E
KES

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

THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
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THOMAS TAGLEFERRY, a/k/a *
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and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 15th day of January, 2003:

First-Class Mail, Postage Prepaid

Thomas Carfley
601 Anderson Street
Curwensville, PA 16833

Patrick Carfley
Route 2
Curwensville, PA 16833

Carol Smith
RD
Clearfield, PA 16830


James A. Naddeo
Attorney for Plaintiffs

Atty Laddoo
C/10:50 AM pd: 7.00
n: PC

I re-stated complaint
to Atty

~~eff~~

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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THOMAS G. KELLY and
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* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* **PRAECIPE TO REINSTATE
COMPLAINT**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 23 2003

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
*
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v. * No. 02-1960-CD
* Action to Quiet Title
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THOMAS TAGLEFERRY, a/k/a *
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TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

PRAECIPE TO REINSTATE COMPLAINT

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please reinstate the Complaint filed in the above-
captioned case.



James A. Naddeo
Attorney for Plaintiffs

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

THOMAS G. KELLY and
DEBRA A. KELLY,
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v.

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THOMAS TAGLIFERRE, a/k/a
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Defendants.

* No. 02-1960-CD
* Action to Quiet Title

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CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 23 2003

William A. Shaw
Prothonotary

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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THOMAS G. KELLY and
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V.

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THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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THROUGH THEM,

Defendants.

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 23RD day of January, 2003:

First-Class Mail, Postage Prepaid

Raymond Carfley
501 Grampian Road
Curwensville, PA 16833

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

1cc
Amy Madder
01/30/81

IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
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TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

JAN 23 2003

William A. Shaw
Prothonotary

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

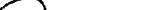
CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 23RD day of January, 2003:

First-Class Mail, Postage Prepaid

Joseph Carfley
Curwensville Elder Care
Curwensville, PA 16833

Patricia Balocco
Route 1
Curwensville, PA 16833


James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

✓
6/3/30 2cc ~~Aug~~ Nัดดี

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

FLD 05 2003

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
*
Plaintiffs, *
*
v. * No. 02-1960-CD
* Action to Quiet Title
THOMAS TAGLEFERRY, a/k/a *
THOMAS TAGLIFERRE, a/k/a *
TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 5th day of February, 2003:

First-Class Mail, Postage Prepaid

Gloria Tecca
76220 Fairway Drive
Indian Wells, CA 92210

Janie Newman
Robinson Street
DuBois, PA 15801

Bernard Ferdinando
822 Charles Street
Eastlake, OH 44095



James A. Naddeo
Attorney for Plaintiffs

6/3-33 P.M.

3 ea to ~~the~~ ~~the~~ ~~the~~

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13443

KELLY, THOMAS G. & DEBRA A.

02-1960-CD

VS.

TANGLEFERRY, THOMAS a/k/a THOMAS TAGLIFERRE a/k/a TOMASO TAG

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

NOW DECEMBER 20, 2002 AT 11:20 AM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON KENNETH CARFLEY, DEFENDANT AT RESIDENCE, 101 REIGHARD ST., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO LSARRY CARFLEY, SON A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

NOW DECEMBER 20, 2002 AT 2:54 PM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON LOUIE CARFLEY, DEFENDANT AT RESIDENCE, 326 STATE ST., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO SARAH CARFLEY, WIFE A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET

NOW DECEMBER 20, 2002 AT 3:09 PM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON PATRICK CARFLEY, DEFENDANT AT RESIDENCE, 221 MCLAUGHLIN ST., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO PATRICK CARFLEY A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET

NOW DECEMBER 20, 2002 AT 3:19 PM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ALBERT CARFLEY, DEFENDANT AT RESIDENCE, 520 BLOOMINGTON AVE., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ALBERT CARFLEY A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET

FILED

FEB 05 2003

William A. Shaw
Prothonotary



In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13443

KELLY, THOMAS G. & DEBRA A.

02-1960-CD

VS.

TANGLEFERRY, THOMAS a/k/a THOMAS TAGLIFERRE a/k/a TOMASO TAG

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

NOW DECEMBER 23, 2002 AT 10:45 AM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON PATRICK CARFLEY, DEFENDANT AT EMPLOYMENT, CLEARFIELD HOSPITAL, TURNPIKE AVE., CLEARFIELD, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO PATRICK CARFLEY A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

NOW DECEMBER 23, 2002 AT 10:50 AM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON CAROL SMITH, DEFENDANT AT EMPLOYMENT, JACK'S DONUTS, OLD TOWN ROAD, CLEARFIELD, CLEARFIELD COUNTY PENNSYLVANIA BY HANDING TO CAROL SMITH A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HER THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

NOW DECEMBER 23, 2002 AT 12:30 PM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON THOMAS CARFLEY, DEFENDANT AT RESIDENCE, 601 ANDERSON ST., CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO THOMAS CARFLEY A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: COUDRIET/RYEN

NOW DECEMBER 30, 2002 AT 1:40 PM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON RAYMOND CARFLEY, DEFENDANT AT RESIDENCE, 501 GRAMPIAN ROAD, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO RAYMOND CARFLEY A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.

SERVED BY: MCCLEARY/NEVLING

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13443

KELLY, THOMAS G. & DEBRA A.

02-1960-CD

VS.

TANGLEFERRY, THOMAS a/k/a THOMAS TAGLIFERRE a/k/a TOMASO TAG

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

**NOW JANUARY 2, 2003 AT 11:03 PM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON PATRICIA BALOCCO, DEFENDANT AT RESIDENCE, RT#1, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO PATRICIA BALOCCO A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: DAVIS/MORGILLO**

**NOW JANUARY 2, 2003 AT 11:25 AM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON JOSEPH CARFLEY, DEFENDANT AT RESIDENCE, RD, CURWENSVILLE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ALBERT CARFLEY, BROTHER (CARE TAKER) A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.
SERVED BY: DAVIS/MORGILLO**

**NOW JANUARY 8, 2003 AT 10:50 AM EST SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON JANIE NEWMAN, DEFENDANT AT RESIDENCE, 116 ROBINSON ST., DUBOIS, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO JANIE NEWMAN A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HER THE CONTENTS THEREOF.
SERVED BY: COUDRIET/RYEN**

NOW FEBRUARY 5, 2003 RETURN THE WITHIN COMPLAINT ACTION TO QUIET TITLE "NOT SERVED, TIME EXPIRED" AS TO ALBERT L. CARFLEY, DEFENDANT.

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13443

KELLY, THOMAS G. & DEBRA A.

02-1960-CD

VS.

TANGLEFERRY, THOMAS a/k/a THOMAS TAGLIFERRE a/k/a TOMASO TAG

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

Return Costs

Cost	Description
-------------	--------------------

117.92	SHFF. HAWKINS PAID BY: Atty
---------------	------------------------------------

120.00	SURCHARGE PAID BY: ATTY.
---------------	---------------------------------

Sworn to Before Me This

5th Day Of Feb 2003
C. A. Hawkins

WILLIAM A. SHAW
Prothonotary
My Commission Expires
1st Monday in Jan. 2006
Clearfield Co., Clearfield, PA

So Answers,

*Chester A. Hawkins
by Marlyn Henn*

Chester A. Hawkins
Sheriff

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

**PRAECIPE TO
REINSTATE COMPLAINT**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

FEB 26 2003

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

★ ★ ★ ★ ★

No. 02-1960-CD
Action to Quiet Title

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

4

PRAECLP TO REINSTATE COMPLAINT

TO THE PROTHONOTARY OF CLEARFIELD COUNTY:

Please reinstate the Complaint filed in the above-captioned case.

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

FILED

Atty Madden
PL 700

01/10/2003
FEB 26 2003

No Compl. Re-instate,
followed by Motion to publicize
↳ 1cc to Re-instate to Staff on 3/4/03

William A. Shaw
Prothonotary
cc:

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* **MOTION FOR SPECIAL
ORDER DIRECTING SERVICE
BY PUBLICATION**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

FEB 26 2003

William A. Shaw
Prothonotary

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

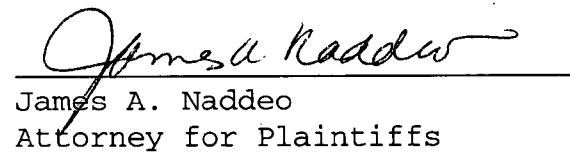
THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
*
Plaintiffs, *
*
v. * No. 02-1960-CD
* Action to Quiet Title
*
THOMAS TAGLEFERRY, a/k/a *
THOMAS TAGLIFERRE, a/k/a *
TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

MOTION FOR SPECIAL ORDER DIRECTING
SERVICE BY PUBLICATION

NOW COME the Movants, Thomas G. Kelly and Debra A. Kelly, and by their attorney, James A. Naddeo, set forth the following:

1. The Movants are the Plaintiffs in the above-captioned matter.
2. The Movants filed a Quiet Title Action on or about December 18, 2002.
3. The Movants desire to have your Honorable Court enter an Order Pursuant to Pa. R.C.P. No. 430.
4. In support of this request, Movants incorporate the attached affidavit.

WHEREFORE, Movants respectfully request your Honorable Court to grant the relief sought in this Motion.


James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

7

No. 02-1960-CD
Action to Quiet Title

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

72

AFFIDAVIT PURSUANT TO PA.R.C.P. 430

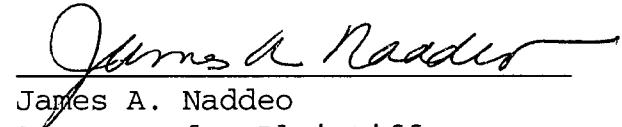
1. Counsel for Movants has been unable to determine the whereabouts of the following defendants; Patsy Carfley, Katherine Carfley, Elizabeth Carfley, Bessie Carfley Ferdinando, Shirley O'Neill, Samuel Carfley, Barbara Robinson, Michael Carfley, Louise Carfley, Anthony Carfley, Joyce Carfley, Carrie Wilt, Jean Carfley, Shirley Carfley, Dotty Carfley, Jerry Carfley, Thelma Carfley and Albert L. Carfley.

2. Movants and Counsel for Movants have made the following attempts to locate Defendants:

A. Telephone directory assistance for Clearfield, Philipsburg, DuBois and Pittsburgh Pennsylvania, and surrounding areas.

- B. Local tax records.
- C. Inquiries of relatives of Defendants.
- D. Sheriff of Clearfield County, Pennsylvania.
- E. Internet search.

I verify that the statements made in this Affidavit are true and correct. I understand that false statements herein are made subject to the penalties of Pa. C.S. Section 4904 relating to unsworn falsifications to authorities.


James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

FILED

100
Angie Maddico
6/11/08-201
FEB 26 2003

William A. Shaw
Prothonotary
BAC
92

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* **ORDER GRANTING
MOTION FOR SPECIAL
ORDER DIRECTING SERVICE
BY PUBLICATION**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED

MAR 04 2003

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

*
*
*
*
*

Plaintiffs,

*
*

v.

* No. 02-1960-CD
* Action to Quiet Title

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

*
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*

Defendants.

*

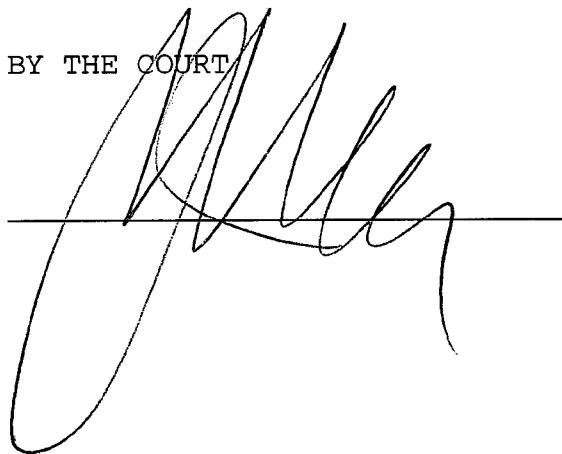
ORDER GRANTING MOTION FOR SPECIAL ORDER
DIRECTING SERVICE BY PUBLICATION

AND NOW, this 31 day of ^{March} ~~February~~, 2003, upon

consideration of the Plaintiffs' Motion for a Special Order
Directing Service by way of Publication, and it appearing to the
Court that Plaintiffs have made a good faith effort to locate and
serve Defendants, Patsy Carfley, Katherine Carfley, Elizabeth
Carfley, Bessie Carfley Ferdinando, Shirley O'Neill, Samuel
Carfley, Barbara Robinson, Michael Carfley, Louise Carfley,
Anthony Carfley, Joyce Carfley, Carrie Wilt, Jean Carfley, Shirley
Carfley, Dotty Carfley, Jerry Carfley, Thelma Carfley and Albert
L. Carfley, it is hereby ORDERED that the Motion is granted and
that service upon the Defendants, Patsy Carfley, Katherine
Carfley, Elizabeth Carfley, Bessie Carfley Ferdinando, Shirley

O'Neill, Samuel Carfley, Barbara Robinson, Michael Carfley, Louise Carfley, Anthony Carfley, Joyce Carfley, Carrie Wilt, Jean Carfley, Shirley Carfley, Dotty Carfley, Jerry Carfley, Thelma Carfley and Albert L. Carfley, is to be made by way of publication by advertising the Notice required by Pa. R.C.P. No. 430 once in the Clearfield County Law Journal and once in a newspaper of general circulation within the County.

BY THE COURT

A handwritten signature in black ink, appearing to read "J. M. Kelly", is written over a horizontal line. The signature is fluid and cursive, with a large loop on the left and several smaller loops and lines extending to the right.

FILED 2cc Amy Nadeau
APR 30 2003 CLERK
MAR 04 2003 CLERK
William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13443

KELLY, THOMAS G. & DEBRA A.

02-1960-CD

VS.

TANGLEFERRY, THOMAS a/k/a THOMAS TAGLIFERRE a/k/a TOMASO TAG

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

NOW FEBRUARY 27, 2003 RETURN THE WITHIN COMPLAINT ACTION TO QUIET TITLE "NOT SERVED, TIME EXPIRED" AS TO ALBERT L. CARFLEY, DEFENDANT. SEVERAL ATTEMPTS NOT AT HOME.

Return Costs

Cost Description

13.17 SHFF. HAWKINS PAID BY: *atty*

10.00 SURCHARGE PAID BY: *atty*

Sworn to Before Me This

So Answers,

10 Day Of April 2003
William Shaw

Chester Hawkins
by Marley Hark
Chester A. Hawkins
Sheriff

FILED

APR 10 2003

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and
DEBRA A. KELLY, Husband
and wife,

Plaintiffs

vs.

No. 2002-1960-CD
Action to Quiet Title

THOMAS TANGLEFERRY, a/k/a,
THOMAS TAGLIFERRE, a/k/a,
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any INDIVIDUALS
CLAIMING THROUGH THEM

Defendants

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

DEC 18 2002

Attest

William C. Brown
Prothonotary/
Clerk of Courts

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

THOMAS G. KELLY and
DEBRA A. KELLY, Husband and Wife *
Plaintiffs

vs. * No. 2002 - -CD
* Action to Quiet Title

THOMAS TANGLEFERRY, a/k/a, *
THOMAS TAGLIFERRE, a/k/a, *
TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any INDIVIDUALS *
CLAIMING THROUGH THEM, *

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 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 the 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 Court Administrator
Clearfield County Courthouse
1 North Second Street
Clearfield PA 16830
814 765-2641

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

*

THOMAS G. KELLY and
DEBRA A. KELLY, Husband and Wife *
Plaintiffs

*

vs. * No. 2002- -CD
* Action to Quiet Title

THOMAS TANGLEFERRY, a/k/a,
THOMAS TAGLIFERRE, a/k/a, *
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any INDIVIDUALS
CLAIMING THROUGH THEM, *
Defendants

*

COMPLAINT

1. The Plaintiffs are Thomas G. Kelly and Debra A. Kelly, Husband and Wife, both of whom are sui juris individuals who reside at 413 Scofield Street, Curwensville, Clearfield County, Pennsylvania, 16833.

2. The Defendant Thomas Tangleferry a/k/a, Thomas Tagliferre a/k/a, Tomaso Tagliaferri, believed to be deceased; and the Heirs and Assigns and any Individuals claiming through him, whose addresses are unknown.

3. The Defendant Patsy Carfley deceased April 21, 1965 and is survived by the heirs set forth in Exhibit "A" attached hereto and incorporated here and by references set forth in full.

4. Plaintiffs are the owners of a tract of land located in Curwensville Borough, Clearfield County, Pennsylvania more particularly described on Exhibit "B" attached hereto and incorporated here and by references set forth in full.

5. The Plaintiffs acquired title to the premises by deed from Albert Carfley as Attorney in Fact for Joseph Carfley dated August 22, 1996 and recorded in Clearfield County Deed and Records Book, Volume 1782, page 509.

6. The Grantor of Paragraph 5 above acquired title to the premises by deed from Bessie Ferdinando and Bernard Ferdinando, her husband, dated February 21, 1957 and recorded in the Clearfield County Deed Book Volume 458, Page 30.

7. The Grantors of Paragraph 6 above acquired title to the premises by deed from the Borough of Curwensville, Pennsylvania and School District of the Borough of Curwensville, Pennsylvania both municipal corporations in the Commonwealth of Pennsylvania by deed dated June 15, 1943 and recorded in Clearfield County Deed Book Volume 403, Page 534.

8. The Grantors of Paragraph 7 above acquired title to the premises by deed from Commissioners of Clearfield County, Pennsylvania dated May 13, 1943 and recorded in Clearfield County Deed Book 346, Page 429.

9. The Grantor in Paragraph 8 above acquired title to the premises by deed from the Treasurer of the County of Clearfield, dated December 13, 1937 and recorded in Clearfield County Deed Book 346, Page 428. Being sold as the property of Thomas Tangleferry.

10. The property in question was assessed in the name of

Patsy Carfley for the years 1946 through 1959 inclusive.

11. The purpose of this Quiet Title Action is to clear any defect resulting from the tax sale set forth in Paragraph 9 above and the incorrect assessment set forth in Paragraph 10 above.

12. The Plaintiffs and their predecessors in title have exercised adverse, continuous, visible, notorious, exclusive and hostile possession over the premises and have continued such possession in excess of twenty-one (21) years.

WHEREFORE, Plaintiffs request:

(a) That by Decree of Your Honorable Court, it may be declared that title to the premises set forth in Paragraph 4 of this Complaint is in the Plaintiffs and that they shall be allowed to enjoy such property in peace, and;

(b) That the Defendants, within twenty (20) days from the receipt of this Compliant, institute an action of ejection 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 property, from issuing or maintaining an ejectment of said premises and from encumbering, mortgaging or conveying the said premises or any part thereof.



James A. Naddeo
Attorney for Plaintiffs

Patsy Carfley d.o.d. – April 1965

Spouse
↓

Katherine Carfley Widow (also deceased)

↓
children

(s) **Joseph Carfley**
Curwensville Elder Care
Curwensville, PA 16833

(s) **Albert Carley**
520 Bloomington Ave.
Curwensville, PA 16833

(s) **Louie Carfley**
326 State St.
Curwensville, PA 16833

(s) **Raymond Carfley**
501 Grampian Road
Curwensville, PA 16833

Elizabeth Carfley
deceased – no surviving spouse or children

Bessie Carfley Ferdinando (deceased)

- (d) Shirley O'Neill, unknown
- (d) Gloria Tecca, 76220 Fairway Drive, Indian Wells, CA 92210
- (d) Janie Newman, Robinson St., DuBois, PA 15801
- (s) Bernard Ferdinando, 822 Charles St. Eastlake, OH 44095

Samuel Carfley (deceased)

(s) Patrick Carfley, 211 McLaughlin St., Curwensville, PA 16833
(d) Barbara Robinson, unknown

Michael Carfley (deceased)

(w) Louise Carfley, unknown
(d) Patricia Balocco, Route #1, Curwensville, PA 16833

Anthony Carfley (deceased)

Joyce (unknown), Curwensville, PA 16833
Thomas Carfley, 601 Anderson St, Curwensville, PA 16833
Patrick Carfley, Route #2, Curwensville, PA 16833
Albert L. Carfley, Hyde, PA 16843
Carol Smith, RD, Clearfield, PA 16830
Carrie Wilt, unknown
Jean (unknown), unknown
Shirley (unknown), unknown
Dotty (unknown), unknown
Kenneth Carfley, 101 Reighard St., Clearfield, PA 16830
Jerry Carfley, unknown
Thelma (unknown) (deceased)
survived by unknown

ALL that certain lot or piece of ground situate in the Borough of Curwensville, County of Clearfield, and Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a post corner of lot now or formerly of Eli N. Korb at a point Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center of Grampian Road; thence by said lot of Eli N. Korb North Thirty-One (31) degrees West One Hundred Sixty-Nine (169) feet to a post on an alley; thence by said alley South Fifty-Nine (59) degrees West Fifty (50) feet to a post at the corner of lot now or formerly of Mrs. James Freeman Estate; thence by said lot South Thirty-One (31) degrees East One Hundred Sixty-Five (165) feet to a post, Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center of Grampian Road; thence by said Grampian Road, Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center thereof, Fifty (50) feet to a post and place of beginning.

BEING further identified in the Map Assessment Office of Clearfield County as having Map No. H10-666-00015, consisting of garage and lot.

COMMONWEALTH OF PENNSYLVANIA)

ss.

COUNTY OF CLEARFIELD)

Before me, the undersigned officer, personally appeared THOMAS G. KELLY and DEBRA A. KELLY, husband and wife, who being duly sworn according to law, deposes and states that the facts set forth in the foregoing Complaint are true and correct to the best of their knowledge, information and belief.

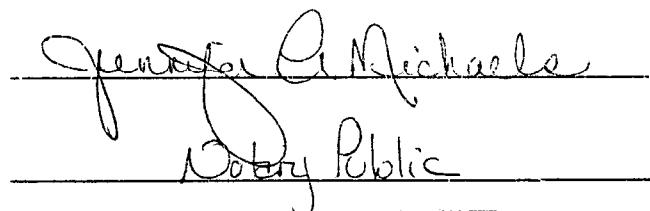


Thomas G. Kelly



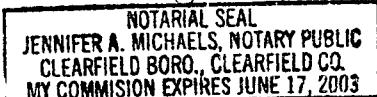
Debra A. Kelly

SWORN and SUBSCRIBED before me this 30th day of August, 2001.



Jennifer A. Michaels

Notary Public



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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

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No. 02-1960-CD
Action to Quiet Title

Type of Pleading:

CERTIFICATE OF SERVICE

Filed on behalf of:
Plaintiffs

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED

APR 16 2003

William A. Shaw
Prothonotary

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

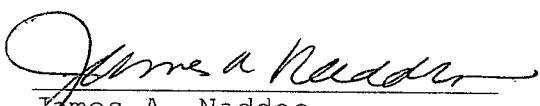
THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
*
Plaintiffs, *
*
v. * No. 02-1960-CD
* Action to Quiet Title
THOMAS TAGLEFERRY, a/k/a *
THOMAS TAGLIFERRE, a/k/a *
TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 16th day of April, 2003:

First-Class Mail, Postage Prepaid

Albert L. Carfley
PO Box 234
Hyde, PA 16843


James A. Naddeo
Attorney for Plaintiffs

FILED 1CC
6/3/03 4:17 PM
APR 18 2003 8:00 AM
Atty added
9/20
William A. Shaw
Prothonotary

In The Court of Common Pleas of Clearfield County, Pennsylvania

Sheriff Docket # 13443

KELLY, THOMAS G. & DEBRA A.

02-1960-CD

VS.

TANGLEFERRY, THOMAS a/k/a THOMAS TAGLIFERRE a/k/a TOMASO TAG

COMPLAINT ACTION TO QUIET TITLE

SHERIFF RETURNS

NOW MARCH 24, 2003 AT 5:29 PM SERVED THE WITHIN COMPLAINT ACTION TO QUIET TITLE ON ALBERT L. CARFLEY, DEFENDANT AT RESIDENCE, HOOVER TRAILER CT., HYDE, CLEARFIELD COUNTY, PENNSYLVANIA BY HANDING TO ALBERT L. CARFLEY A TRUE AND ATTESTED COPY OF THE ORIGINAL COMPLAINT ACTION TO QUIET TITLE AND MADE KNOWN TO HIM THE CONTENTS THEREOF.
SERVED BY: MCCLEARY/NEVLING

Return Costs

Cost	Description
------	-------------

11.97	SHFF. HAWKINS PAID BY: <i>City</i>
-------	------------------------------------

10.00	SURCHARGE PAID BY: <i>City</i>
-------	--------------------------------

Sworn to Before Me This

30 Day Of April 2003
William A. Shaw

So Answers,

Chester A. Hawkins
by Marilyn Hupp
Chester A. Hawkins
Sheriff

FILED

0 2:48 BA

APR 30 2003

William A. Shaw
Prothonotary

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

AFFIDAVIT

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* Naddeo & Lewis, LLC
* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED
10/4/07
APR 09 2007
NO CC
W
William A. Shaw
Prothonotary/Clerk of Courts

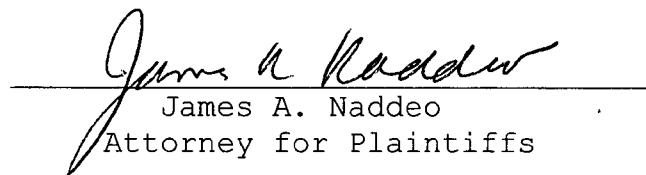
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
*
Plaintiffs, *
*
v. * No. 02-1960-CD
* Action to Quiet Title
THOMAS TAGLEFERRY, a/k/a *
THOMAS TAGLIFERRE, a/k/a *
TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

AFFIDAVIT

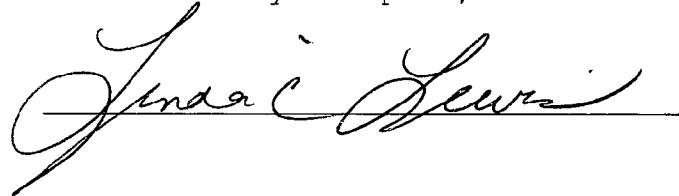
James A. Naddeo, Esquire, being duly sworn according to law, deposes and says that he is attorney for Plaintiffs and makes this affidavit on behalf of the Plaintiffs, being authorized to do so; that a Complaint in this action to quiet title, containing a notice to defend within twenty days of service was duly served on the Defendants, Patsy Carfley, Katherine Carfley, Elizabeth Carfley, Bessie Carfley, Ferdinando Carfley, Shirley O'Neill, Samuel Carfley, Barbara Robinson, Michael Carfley, Louise Carfley, Anthony Carfley, Joyce Carfley, Carrie Wilt, Jean Carfley, Shirley Carfley, Dorothy Carfley, Jerry Carfley, Thelma Carfley and Albert Carfley, by publication in the Progress on March 10, 2003 and the Clearfield County

Legal Journal for week of March 14, 2003, proofs of publications are attached hereto; and that to date the Defendants have not filed an answer in the action.



James A. Naddeo
Attorney for Plaintiffs

SWORN and SUBSCRIBED before me this 5th day of April, 2007.



COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Linda C. Lewis, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires July 25, 2007

PROOF OF PUBLICATION

IN THE COURT OF
COMMON PLEAS, ^{PA}
FEND AGAINST THE FOLLOWING PA-
FORTH IN THE FOLLOWING PA-
GES YOU MUST TAKE ACTION
WITHIN TWENTY (20) DAYS
AFTER THIS COMPLAINT AND
NOTICE ARE SERVED, BY EN-
TERING A WRITTEN APPEAR-
ANCE PERSONALLY OR BY THE
ATTORNEY FILING WITH THE
COURT YOUR DEFENSES OR
OBJECTIONS TO THE CLAIMS
SET FORTH AGAINST YOU. YOU
ARE WARNED THAT IF YOU DO
NOT SO THE CASE MAY A JUDG-
MENT MAY WITHOUT FUR-
THER NOTICE FOR THE PLAINT-
IFFS, YOU MAY LOSE MONEY
OR PROPERTY OR OTHER
RIGHTS IMPORTANT TO YOU
YOU SHOULD TAKE THIS NO-
TICE TO YOUR LAWYER AT
ONCE IF YOU DO NOT HAVE A
LAWYER GO TO OR TELEPHONE
ONE, GO TO OR TELEPHONE
THE OFFICE SET FORTH BELOW
TO FIND OUT WHERE YOU CAN
GET LEGAL HELP.

cc: Court Administrator, Clearfield &
County Courthouse, Second &
Market Streets, Clearfield, PA
(ext.)
16830 (814) 765-2641
50-511.
att James Nardino, Esquire, 221 1/2 E
Locust Street, Clearfield, PA
16830. (814) 765-1601
3:10-10-b
e of any paper and jo
the

STATE OF PENNSYLVANIA : SS:
COUNTY OF CLEARFIELD :
On this 21st day of March, A.D. 20 03,
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
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

March 10, 2003
the regular issues of _____
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.

March 10, 2003
Sworn and subscribed to before me the day and year aforesaid.

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

Notary Public
My Commission Expires
September 16, 2004

FILED

APR 09 2007

William A. Shaw
Prothonotary/Clerk of Courts

PROOF OF PUBLICATION

STATE OF PENNSYLVANIA : :

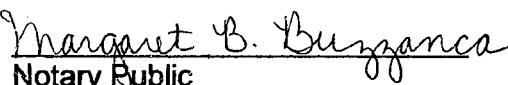
COUNTY OF CLEARFIELD : :

On this 12th day of March AD 2003, 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 March 14, 2003, Vol. 15 No.11. And that all of the allegations of this statement as to the time, place, and character of the publication are true.

MAR 21 2003


Gary A. Knaresboro, Esquire
Editor

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


Margaret B. Buzzanca
Notary Public
My Commission Expires

NOTARIAL SEAL
MARGARET B. BUZZANCA, Notary Public
Clearfield Boro, Clearfield County, PA
My Commission Expires Nov. 23, 2005

James A Naddeo
PO Box 552
Clearfield PA 16830

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

HOMAS G. KELLY and DEBRA A. KELLY, husband and wife, Plaintiffs, vs. THOMAS TAGLEFERRY, a/k/a THOMAS TAGLIFERRE, a/k/a TOMASO TAGLIAFERRI, PATSY CARFLEY and the HEIRS and ASSIGNS and any INDIVIDUALS CLAIMING THROUGH THEM, Defendants.

ACTION TO QUIET TITLE
NO. 02-1960-CD

TO: PATSY CARFLEY, KATHERINE CARFLEY, ELIZABETH CARFLEY, BESSIE CARFLEY FERDINANDO, SHIRLEY O'NEILL, SAMUEL CARFLEY, BARBARA ROBINSON, MICHAEL CARFLEY, LOUISE CARFLEY, ANTHONY CARFLEY, JOYCE CARFLEY, CARRIE WILT, JEAN CARFLEY, SHIRLEY CARFLEY, DOTTY CARFLEY, JERRY CARFLEY, THELMA CARFLEY and ALBERT L. CARFLEY, their heirs, devisees, executors, administrators, assigns and successors.

You are hereby notified that an action to quiet title to the premises situate in the Borough of Curwensville, County of Clearfield, and the Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a post corner of lot now or formerly of Eli N. Korb at a point Sixteen and One-Half (16½) feet from the center of Grampian Road; thence by said lot of Eli N. Korb North Thirty-One (31) degrees West One Hundred Sixty-Nine (169) feet to a post on an alley; thence by said alley South Fifty-Nine (59) degrees West Fifty (50) feet to a post at the corner of lot now or formerly of Mrs. James Freeman Estate; thence by said lot South Thirty-One (31) degrees East One Hundred Sixty-five (165) feet to a post, Sixteen and One-Half (16½) feet from the center of Grampian Road; thence by said Grampian Road, Sixteen and One-Half (16½) feet from the center thereof, Fifty (50) feet to a post and place of beginning.

BEING further identified in the Map Assessment Office of Clearfield County as having Map No. H10-666-00015, consisting of garage and lot.

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

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

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 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 JUDGMENTS MAY BE ENTERED AGAINST YOU WITHOUT FURTHER NOTICE FOR THE RELIEF REQUESTED BY THE PLAINTIFFS, YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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

James A. Naddeo, Esquire, 211½ E. Locust Street, Clearfield, PA 16830. (814) 765-1601.

IN THE COURT OF COMMON PLEAS
OF CLEARFIELD COUNTY,
PENNSYLVANIA

IN RE: APPROVAL OF SALE OF
UNUSED AND UNNECESSARY LAND OF
THE DUBOIS AREA SCHOOL DISTRICT
NO. 03-200-CD
PUBLIC NOTICE

To all parties interested in real estate of the DuBois Area School District located in the City of DuBois, Clearfield County, Pennsylvania.

You are hereby notified that the DuBois Area School District has filed a Petition of Approval of Sale of Unused and Unnecessary Land with the Court of Common Pleas of Clearfield County at the

above number and year.

A public hearing on said Petition will be held on March 24, 2003 at 2:00 p.m. in Court Room No. 1, Clearfield County Court House, Clearfield, Pennsylvania.

The purpose of the Petition is to approve an agreement between the DuBois Area School District and David J. Stern for the exchange of two parcels of land of equal size and value containing .64 acres, more or less to benefit the DuBois Area School District for the purpose of constructing a recreational field.

All interested persons are welcome to attend.

William R. Strong, Esquire, Solicitor for DuBois Area School District, PO Box 7, 616 Main Street, Clarion, PA 16214. (814) 226-4171.

ADV: February 28th, 2003, March 7th & 14th, 2003.

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

ENER VEST OLANTA, LLC, Plaintiff vs. EMILY V. BOULTON, deceased, her administrators, executors, heirs, successors and assigns; HAROLD J. BOULTON, deceased, his administrators, executors, heirs, successors and assigns; JULIA K. BOULTON, a/k/a JULIA KERR CHASE BOULTON, a/k/a JULIA K. CHASE BOULTON, a/k/a JULIA K. CHASE, deceased, her administrators, executors, heirs, successors and assigns; EMILY CHASE WEAVER; WILLIAM C. CHASE, JR.; SAMUEL R. HAMILTON, a/k/a S.R. HAMILTON, deceased, his administrators, executors, heirs, successors and assigns; ANNA M. HAMILTON, deceased, her administrators, executors, heirs, successors and assigns; BETTY M. HAMILTON, a/k/a ELIZABETH M. HAMILTON, deceased, her administrators, executors, heirs, successors and assigns; DON W. EIGHMY, deceased, his administrators, executors, heirs, successors and assigns; ROBERTINA EIGHMY; DOLLIE C. BECKMAN; and all other persons having or claiming to have any right, title or interest in the oil and gas estate hereinafter described, Defendants.

NOTICE

TO: EMILY V. BOULTON, deceased, HAROLD J. BOULTON, deceased, JULIA K. BOULTON, a/k/a JULIA KERR CHASE BOULTON, a/k/a JULIA K. CHASE, deceased; SAMUEL R. HAMILTON, a/k/a S.R. HAMILTON, deceased, ANNA M.

HAMILTON, deceased, BETTY M. HAMILTON, a/k/a ELIZABETH M. HAMILTON, deceased, DON W. EIGHMY, deceased, their respective Executors, Administrators, heirs, successors and assigns, or whoever may be the holders of any claim of title to the oil and gas underlying a tract of 145 acres, more or less, situate in Pike Township, Clearfield County, Pennsylvania.

TAKE NOTICE that on November 12, 2002 plaintiff filed its Complaint in Civil Action to Quiet Title to the oil and gas underlying 145 acres, more or less, situate under three tracts of land in Pike Township, Clearfield County, Pennsylvania, described in three deeds of Harry A. Cathcart dated October 29, 1928 to S. R. Hamilton, e.g. in Deed Book 290, Page 164, Deed Book 290, page 166 and Deed Book 290, page 169.

Plaintiff avers that it is the holder of a leasehold interest in the said oil and gas by a lease dated May 1, 2001 and that its title to the said oil and gas is based on the conveyance by Harry A. Cathcart to S. R. Hamilton of the coal and other minerals including oil and gas by the three aforesaid deeds dated October 29, 1928.

NOTICE TO DEFEND

You have been sued in court. If you wish to defend against the claims set forth in the Complaint, you must enter a written appearance personally or by attorney and file your defenses 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 by the court without further notice for the relief requested by the Plaintiffs. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS NOTICE TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

David S. Meholick, Court Administrator, Clearfield County Courthouse, 230 E. Market Street, Clearfield, PA 16830 (814) 765-2641, Ext. 5982 OR Pennsylvania Lawyer Referral Service, Pennsylvania Bar Association PO Box 186 Harrisburg, PA 17108 (800) 692-7375.

DONALD D. SAXTON, JR., P.C., 119 South College Street, Washington, PA 15301.

ADV: February 21st, 28th, March 7th, 14th, 2003.

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

AFFIDAVIT

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* Naddeo & Lewis, LLC
* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED NO
04/10/2004
APR 09 2004
WAS
APR 09 2004

William A. Shaw
Prothonotary/Clerk of Courts

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

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* No. 02-1960-CD

* Action to Quiet Title

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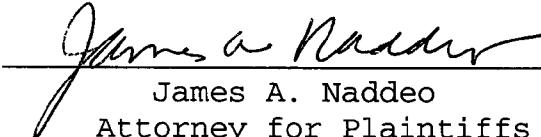
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AFFIDAVIT

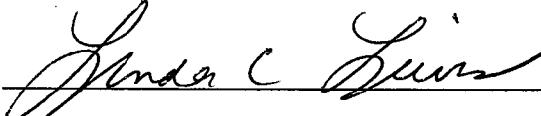
James A. Naddeo, Esquire, being duly sworn according to law, deposes and says that he is attorney for Plaintiffs and makes this affidavit on behalf of the Plaintiffs, being authorized to do so; that a Complaint in this action to quiet title, containing a notice to defend within twenty days of service was duly served on the defendants, Joseph Carfley, Albert Carfley, Louie Carfley, Patrick Carfley, Raymond Carfley, Patricia Balocco, Thomas Carfley, Carol Smith, Kenneth Carfley Patrick Carfley, Gloria Tecca, Janie Newman, Bernard Ferdinando and Albert Carfley, and ten day notice of intention to enter default judgment was mailed to defendants, Joseph Carfley, Albert Carfley, Louie Carfley, Patrick Carfley, Raymond Carfley,

Patricia Balocco, Thomas Carfley, Carol Smith, Kenneth Carfley, Patrick Carfley, Gloria Tecca, Janie Newman, Bernard Ferdinando and Albert Carfley, and to date the Defendants, Joseph Carfley, Albert Carfley, Louie Carfley, Patrick Carfley, Raymond Carfley, Patricia Balocco, Thomas Carfley, Carol Smith, Kenneth Carfley, Patrick Carfley, Gloria Tecca, Janie Newman, Bernard Ferdinando and Albert Carfley have not filed an answer in the action.



James A. Naddeo
Attorney for Plaintiffs

SWORN and SUBSCRIBED before me this 3rd day of April, 2007.



Linda C. Lewis

COMMONWEALTH OF PENNSYLVANIA

Notarial Seal
Linda C. Lewis, Notary Public
Clearfield Boro, Clearfield County
My Commission Expires July 25, 2007

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* **MOTION FOR DEFAULT**
* **JUDGMENT**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* Naddeo & Lewis, LLC
* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED
01/10/2007
APR 09 2007
NOCC
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William A. Shaw
Prothonotary/Clerk of Courts

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

THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
*
Plaintiffs, *
*
v. * No. 02-1960-CD
* Action to Quiet Title
THOMAS TAGLEFERRY, a/k/a *
THOMAS TAGLIFERRE, a/k/a *
TOMASO TAGLIAFERRI, *
PATSY CARFILEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

MOTION FOR DEFAULT JUDGMENT

AND NOW, this 5th day of April, 2007, an Affidavit having been executed and filed on behalf of the Plaintiffs that the Complaint with Notice to Defend had been served on the Defendants as stated in the Affidavit; and more that twenty (20) days have expired since the date of service and the Defendants not having answered, the Plaintiffs, by their attorney; James A. Naddeo, Esquire, move the Court to enter judgment in favor of the Plaintiffs and against the Defendant and to grant Plaintiffs the relief prayed for in

their Complaint in accordance with Pennsylvania Rules of Civil Procedure No. 1066.

Naddeo & Lewis, LLC

By: James A. Naddeo

James A. Naddeo
Attorney for Plaintiffs

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* **PRAECIPE FOR ENTRY
OF DEFAULT JUDGMENT**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* Naddeo & Lewis, LLC
* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

FILED NO CC
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APR 09 2001
William A. Shaw
Prothonotary/Clerk of Courts

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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Defendants.

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No. 02-1960-CD
Action to Quiet Title

PRAECIPE FOR ENTRY OF DEFAULT JUDGMENT

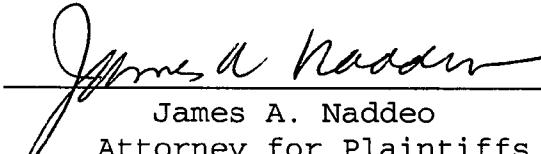
TO THE PROTHONOTARY:

Please enter judgment of default in favor of Plaintiffs, Thomas G. Kelly and Debra A. Kelly and against Defendants, Joseph Carfley, Albert Carfley, Louie Carfley, Patrick Carfley, Raymond Carfley, Patricia Balocco, Thomas Carfley, Carol Smith, Kenneth Carfley, Patrick Carfley, Gloria Tecc, Janie Newman, Bernard Ferdinando and Albert Carfley, for their failure to plead to the complaint in this action within the required time. The Complaint contains a notice to defend within twenty (20) days from the date of service thereof.

Defendant, Joseph Carfley, was served on January 2, 2003. His answer was due to be filed on January 22, 2003. Defendant, Albert Carfley, was served on December 20, 2002. His answer was due to be filed on January 9, 2003. Defendant, Louie Carfley, was served on December 20, 2002. His answer was due to be filed on January 9, 2003. Defendant, Patrick Carfley, was served on December 20, 2002. His answer was due to be filed on January 9, 2003. Defendant, Raymond Carfley, was served on December 30, 2002. His answer was due to be filed on January 19, 2003. Defendant, Patricia Balocco, was served on January 2, 2003. Her answer was due to be filed on January 22, 2003. Defendant, Thomas Carfley, was served on December 23, 2002. His answer was due to be filed on January 12, 2003. Defendant, Carol Smith, was served on December 23, 2002. Her answer was due to be filed on January 12, 2003. Defendant, Kenneth Carfley, was served on December 20, 2002. His answer was due to be filed on January 9, 2003. Defendant, Patrick Carfley, was served on December 23, 2002. His answer was due to be filed on January 12, 2003. Defendant, Gloria Tecca, was served on January 7, 2003. Her answer was due to be filed on January 28, 2003. Defendant, Janie Newman, was served on January 3, 2003. Her answer was due to be filed on January 24, 2003. Defendant, Bernard Ferdinando, was served on January 2, 2003. His answer was due to be filed on

January 23, 2003. Defendant, Albert Carfley, was served on March 24, 2003. His answer was due to be filed on April 14, 2003.

Attached hereto collectively as Exhibit "A" are copies of Plaintiffs' written Notices of Intention to File Praeclipe for Entry of Default Judgment as well as copies of Certificates of Service attached hereto collectively marked as Exhibit "B" showing the dates of service of the Default Judgments which I certify were mailed by regular mail to the Defendants at least ten days prior to the filing of this Praeclipe.



James A. Naddeo
Attorney for Plaintiffs

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

To: Albert Carfley

Date of Notice: January 10, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

Court Administrator
Clearfield County Court House
Market and Second Streets
Clearfield, PA 16830
(814) 765-2641 Ext. 5988

James A. Nadder

James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

mailed
1/10/03

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

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No. 02-1960-CD
Action to Quiet Title

To: Louie Carfley

Date of Notice: January 10, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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James A. Naddeo
James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

mailed
1/10/03

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

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No. 02-1960-CD
Action to Quiet Title

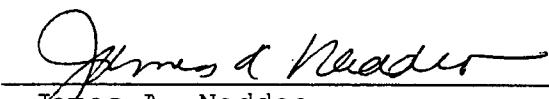
To: Patrick Carfley

Date of Notice: January 10, 2003

IMPORTANT NOTICE

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James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

1.10.03.
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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THROUGH THEM,

Defendants.

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No. 02-1960-CD

Action to Quiet Title

To: Kenneth Carfley

Date of Notice: January 10, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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James A. Naddeo
James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

To: Thomas Carfley

Date of Notice: January 15, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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James L. Haeder

James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

To: Patrick Carfley

Date of Notice: January 15, 2003

IMPORTANT NOTICE

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James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

mailed
1/15/03

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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Defendants.

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No. 02-1960-CD
Action to Quiet Title

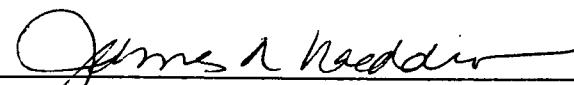
To: Carol Smith

Date of Notice: January 15, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife.

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

To: Joseph Carfley

Date of Notice: January 23, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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James A. Nadel

211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife.

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

To: Patricia Balocco

Date of Notice: January 23, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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(814) 765-2641 Ext. 5988

James A. Naddeo
James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

marked
1-23-03:

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
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Defendants.

* No. 02-1960-CD
* Action to Quiet Title

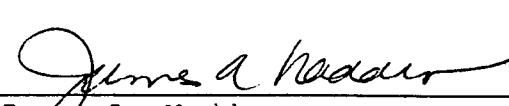
To: Raymond Carfley

Date of Notice: January 23, 2003

IMPORTANT NOTICE

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James A. Naddeo
211½ E. Locust Street, Box 552
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IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

No. 02-1960-CD
Action to Quiet Title

To: Gloria Tecca

Date of Notice: February 5, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

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James A. Naddeo
211½ E. Locust Street, Box 552
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2/6/03
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* * * * *
No. 02-1960-CD
Action to Quiet Title

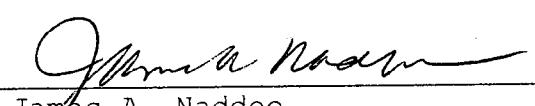
To: Janie Newman

Date of Notice: February 5, 2003

IMPORTANT NOTICE

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211½ E. Locust Street, Box 552
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(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants.

To: Bernard Ferdinando

Date of Notice: February 5, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

Court Administrator
Clearfield County Court House
Market and Second Streets
Clearfield, PA 16830
(814) 765-2641 Ext. 5988

James A. Naddeo

211 1/2 E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

1/10/03 .
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

THOMAS G. KELLY and
DEBRA A. KELLY,
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Plaintiffs,

v.

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THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* CERTIFICATE OF SERVICE

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

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No. 02-1960-CD

Action to Quiet Title

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM.

Defendants:

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 10th day of January, 2003:

First-Class Mail, Postage Prepaid

Albert Carfley
520 Bloomington Avenue
Curwensville, PA 16833

Louie Carfley
326 State Street
Curwensville, PA 16833

Patrick Carfley
211 McLaughlin Street
Curwensville, PA 16833

Kenneth Carfley
101 Reighard Street
Clearfield, PA 16830

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
INDIVIDUALS CLAIMING
THROUGH THEM,

Defendants.

No. 02-1960-CD
Action to Quiet Title

Type of Pleading:

CERTIFICATE OF SERVICE

Filed on behalf of:
Plaintiffs

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

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v.

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No. 02-1960-CD

Action to Quiet Title

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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THROUGH THEM,

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Defendants.

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 23RD day of January, 2003:

First-Class Mail, Postage Prepaid

Joseph Carfley
Curwensville Elder Care
Curwensville, PA 16833

Patricia Balocco
Route 1
Curwensville, PA 16833

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

1-23-03
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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Defendants.

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No. 02-1960-CD

Action to Quiet Title

Type of Pleading:

CERTIFICATE OF SERVICE

Filed on behalf of:

Plaintiffs

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
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Defendants.

No. 02-1960-CD
Action to Quiet Title

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 23RD day of January, 2003:

First-Class Mail, Postage Prepaid

Raymond Carfley
501 Grampian Road
Curwensville, PA 16833

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

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8.0
IN THE COURT OF COMMON PLEAS OF CLEARFIELD COUNTY, PENNSYLVANIA
CIVIL DIVISION

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

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THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
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THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

* Type of Pleading:

* **CERTIFICATE OF SERVICE**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* 211 1/2 E. Locust Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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Defendants.

No. 02-1960-CD
Action to Quiet Title

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 5th day of February, 2003:

First-Class Mail, Postage Prepaid

Gloria Tecca
76220 Fairway Drive
Indian Wells, CA 92210

Janie Newman
Robinson Street
DuBois, PA 15801

Bernard Ferdinando
822 Charles Street
Eastlake, OH 44095

James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs

4.16.05

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

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To: Albert L. Garfl

Date of Notice: April 16, 2003

IMPORTANT NOTICE

YOU ARE IN DEFAULT BECAUSE YOU HAVE FAILED TO ENTER A WRITTEN APPEARANCE PERSONALLY OR BY AN ATTORNEY AND FILE IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. UNLESS YOU ACT WITHIN TEN DAYS FROM THE DATE OF THIS NOTICE, A JUDGMENT MAY BE ENTERED AND YOU MAY LOSE YOUR PROPERTY OR OTHER IMPORTANT RIGHTS. YOU SHOULD TAKE THIS NOTICE TO A LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE FOLLOWING OFFICE TO FIND OUT WHERE YOU CAN GET LEGAL HELP:

Court Administrator
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Clearfield, PA 16830
(814) 765-2641 Ext. 5988

James A. Naddeo
James A. Naddeo
211½ E. Locust Street, Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

V.

THOMAS TAGLEFERRY, a/k/a
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PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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THROUGH THEM.

Defendants.

No. 02-1960-CD
Action to Quiet Title

Type of Pleading:

CERTIFICATE OF SERVICE

Filed on behalf of:
Plaintiffs

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

211 1/2 E. Locust St.

211 1/2 E. Locust Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

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

THOMAS G. KELLY and *
DEBRA A. KELLY, *
Husband and wife, *
*
Plaintiffs, *
*
v. * No. 02-1960-CD
* Action to Quiet Title
THOMAS TAGLEFERRY, a/k/a *
THOMAS TAGLIFERRE, a/k/a *
TOMASO TAGLIAFERRI, *
PATSY CARFLEY and the HEIRS *
and ASSIGNS and any *
INDIVIDUALS CLAIMING *
THROUGH THEM, *
*
Defendants. *

CERTIFICATE OF SERVICE

I, James A. Naddeo, Esquire, do hereby certify that a copy of Notice of Default in the above-captioned action was served on the following persons and in the following manner on the 16th day of April, 2003:

First-Class Mail, Postage Prepaid

Albert L. Carfley
PO Box 234
Hyde, PA 16843

James A. Naddeo

James A. Naddeo
Attorney for Plaintiffs

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

THOMAS G. KELLY and
DEBRA A. KELLY,
Husband and wife,

Plaintiffs,

v.

THOMAS TAGLEFERRY, a/k/a
THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

FILED

APR 1 2007

0/10:45 (WMS)

William A. Shaw
Prothonotary/Clerk of Courts (62)
2 LENS TO ATTY

* Type of Pleading:

* **ORDER**

* Filed on behalf of:
* Plaintiffs

* Counsel of Record for
* this party:

* James A. Naddeo, Esq.
* Pa I.D. 06820

* Naddeo & Lewis, LLC
* 207 East Market Street
* P.O. Box 552
* Clearfield, PA 16830
* (814) 765-1601

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

THOMAS G. KELLY and
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V.

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PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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THROUGH THEM,

Defendants.

No. 02-1960-CD
Action to Quiet Title

FILED

APR 1 2007

William A. Shaw
Prothonotary/Clerk of Courts

ORDER

AND NOW, this 10 of April, 2007, it appearing that a Complaint to Quiet Title in the above stated Action was served on the Defendants and by Affidavit of James A. Naddeo, Esquire, Attorney for Plaintiffs, no answer has been filed in said action on behalf of said Defendants and on motion of James A. Naddeo, Esquire, Attorney for Plaintiffs, it is hereby ORDERED and DIRECTED that Plaintiffs be allowed to enjoy said property in peace and that the said Defendants, be 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 the premises situate in the Borough of

Curwensville, County of Clearfield, and Commonwealth of Pennsylvania, bounded and described as follows:

BEGINNING at a post corner of lot now or formerly of Eli N. Korb at a point Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center of Grampian Road; thence by said lot of Eli N. Korb North Thirty-One (31) degrees West One Hundred Sixty-Nine (169) feet to a post on an alley; thence by said alley South Fifty-Nine (59) degrees West Fifty (50) feet to a post at the corner of lot now or formerly of Mrs. James Freeman Estate; thence by said lot South Thirty-One (31) degrees East One Hundred Sixty-Five (165) feet to a post, Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center of Grampian Road; thence by said Grampian Road, Sixteen and One-Half (16 $\frac{1}{2}$) feet from the center thereof, Fifty (50) feet to a post and place of beginning.

BEING further identified in the Map Assessment Office of Clearfield County as having Map No. H10-666-00015, consisting of garage and lot.

Said ORDER shall be final and absolute unless the Defendants shall file exceptions thereto within thirty (30) days thereafter. If such action is not taken within the thirty (30) day period, the Prothonotary, on Praecept of the Plaintiffs, shall enter final judgment.

BY THE COURT

A handwritten signature in black ink, appearing to read "John C. Currier", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'J' at the beginning.

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

THOMAS G. KELLY and
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Husband and wife,

Plaintiffs,

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THOMAS TAGLIFERRE, a/k/a
TOMASO TAGLIAFERRI,
PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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Defendants.

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No. 02-1960-CD

Action to Quiet Title

Type of Pleading:

**PRAECIPE FOR ENTRY
OF FINAL JUDGMENT**

Filed on behalf of:
Plaintiffs

Counsel of Record for
this party:

James A. Naddeo, Esq.
Pa I.D. 06820

Naddeo & Lewis, LLC
207 East Market Street
P.O. Box 552
Clearfield, PA 16830
(814) 765-1601

FILED
MAY 18 2007
vcc
6K

William A. Shaw
Prothonotary/Clerk of Courts

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

THOMAS G. KELLY and
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PATSY CARFLEY and the HEIRS
and ASSIGNS and any
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THROUGH THEM,

Defendants.

* No. 02-1960-CD
* Action to Quiet Title

PRAECIPE FOR FINAL JUDGMENT

TO THE PROTHONOTARY:

Please enter final judgment against the Defendants
in the above-captioned action for failure to respond to the
Order of Court dated April 10, 2007.

NADDEO & LEWIS, LLC

By: James A. Naddeo
James A. Naddeo
Attorney for Plaintiffs